Chapter 4

Responses to Draft EIS Issues

4. RESPONSES TO DRAFT EIS ISSUES

The Seattle Department of Parks and Recreation issued the Sand Point Magnuson Park Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project Draft EIS on January 3, 2002. The formal review period for public and agency comment on the Draft EIS closed on February 28, 2002. All comments on the Draft EIS received by the close of business on February 28 were considered in the preparation of the Final EIS.

Written comments on the Draft EIS were received in letter form and by electronic mail. Verbal comments were submitted primarily as testimony at a public hearing held on February 4, 2002 at the Sand Point Community Activity Center. Department of Parks and Recreation staff also documented a few verbal comments submitted by telephone; these records were included with the written comments.

Written and telephone comment records were sorted into three categories, based on whether the source of the comments was a public agency, an organization or an individual. All comment records within each category were assigned a letter code (A, O or I), arranged in alphabetical order and numbered sequentially in that order. Based on the number of comment records in each category, the comment record identifiers ranged from A1 to A9 for agency comments, O1 through O17 for organization comments, and I1 through I373 for individual comments. Verbal testimony provided at the public hearings was recorded and documented in a written transcript of each hearing. Testimony statements from the 55 speakers at the hearing were labeled T1 through T55. **Table 4-1** provides a list of all written comment records and testimony statements by source.

The EIS preparers reviewed all comment letters and hearing statements. Specific passages from the letters and testimony that constituted comments on the Draft EIS were marked with vertical bars in the margin of the letter or statement, and all comments within a letter or statement were numbered sequentially. Individual comments were grouped into issue categories based on the nature of the subject matter and the section of the Draft EIS the comment addressed. Through the review and categorization of the comment contents, the EIS preparers established 16 substantive issue categories and identified discrete issues within each category. Comments that represented the same or very similar thoughts were then assigned to individual issues within the respective categories, and alphanumeric issue identifiers were marked alongside each comment. Comments that expressed support for or opposition to the proposed action or some component of the proposal, but did not address the substance of the Draft EIS (alternatives, impact issues or mitigation), were assigned to an additional category as non-substantive issues.

This chapter of the Final EIS presents responses to the substantive issues raised in the public and agency review comments on the Draft EIS. Overall, there are 73 individual issues identified within the 16 issue categories. **Table 4-2** lists all of the issues that were identified from the Draft EIS review comments. The first column in the table identifies the alphanumeric code assigned to each issue; for example, the issue coded SEPA 1 is the first issue identified among those addressing the overall SEPA process, as documented in the Draft EIS. The second column of the table is a summary statement of the issue. In some cases this statement is rather brief, while in others there are multiple discrete aspects of an issue that are noted in the table. The third column in **Table 4-2** lists all of the comments that were interpreted as representing the respective substantive issue. Only the comment record identification code (e.g., I2) is listed for comment records that addressed only non-substantive issues (support or opposition comments).

The text following **Table 4-2** provides the responses to the substantive issues, organized by category as shown in the table. For each issue there is a brief narrative summarizing the issue and the range of comments addressing that issue, a listing of the applicable comments for that issue, and the complete response to the issue. Subheadings are used where necessary in the responses to indicate material addressing a specific aspect of an issue.

Copies of all of the written comment records that contain substantive comments on the Draft EIS (i.e., those addressing the alternatives, specific impact issues and/or mitigation) and the testimony statements are included in **Appendix F**. These copies include the markings that identify the comment record, the comment numbers and the issue codes. Comment records that included substantive comments are denoted with an asterisk (*) in **Table 4-1**. Comment records that contain only non-substantive comments (i.e., those expressing support for or opposition to the proposed action or some element of it) are not reproduced in **Appendix F;** these comment records are available for viewing at the Sand Point Magnuson Park Division office, and copies will be provided on request. For cross-referencing purposes, **Tables 4-1** and **4-2** are repeated as **Tables F1** and **F2** in the appendix, to provide a complete list all of the sources submitted as Draft EIS review input.

Table 4-1
Draft EIS Comment Log

1. Comments from Agencies

Comment Record ID	Agency	Representative	Date of Record	No. of Comments
A1*	King County Department of Parks and Recreation, Active Sports and Youth Recreation Commission	T J Davis	2/28/02	3
A2*	Puget Sound Clean Air Agency	T Hudson	1/16/05	3
A3*	Seattle Design Commission	D Royse	2/28/02	1
A4*	Seattle Public Utilities	J Smith/N Lucas	2/28/02	16
A5*	SeaTran (Seattle Transportation Department)	B Staadecker	2/28/02	2
A6*	US Army Corps of Engineers	J Martin	2/4/02	2
A7*	US Environmental Protection Agency	J Cabreza	2/1/02	10
A8*	Washington Department of Ecology	R Inman	2/26/02	1
A9*	Washington Office of Community Development, OAHP	G Griffith	2/19/02	1

2. Comments from Organizations

Comment Record ID	Organization	Representative	Date of Record	No. of Comments
O1**	Audubon Washington	B Nowlan	2/28/02	6
O2*	Citizens for Wildlife and Neighborhoods	D Ancona	2/28/02	19
O3*	Friends of Athletic Fields	P Lukevich et al.	2/4/02	3
O4*	Friends of Youth	J H Finck	1/31/02	1
O5*	Friends of Youth, Harmony House	J Lucas	2/28/02	1
O6*	Hawthorne Hills Community Council	B Miller	2/27/02	2
O7*	Magnuson Environmental Stewardship Alliance	L Ferguson	2/27/02	7
O8*	Northeast District Council	J Simpkins & J Hale	1/15/02	5
O9*	Northeast Seattle Little League	C Fukushima	2/27/02	1
O10*	Parkpoint Condominium Association	M Sullivan	2/25/02	6
O11*	Ravenna Bryant Community Association	N Merati	2/27/02	4
O12*	Sand Point Community Housing Association	G Eckerman	2/6/02	6
O13*	Sand Point Community Housing Association	J Dickerman	2/28/02	8
O14*	Sand Point Community Liason Committie	J Williams	2/25/02	11
O15*	Seattle Audubon Society	L Braden & M Skumanich	2/28/02	35
O16*	Seattle Residents for Fair Field Lighting	R Barton	2/28/02	8
O17*	Windermere North Community Association	M Fenton	2/28/02	6

* Denotes comment records copied in **Appendix F**.

Table 4-1
Draft EIS Comment Log (cont'd)

3. Comments from Individuals

Comment Record ID	Individual	Date of Record	No. of Comments
I1*	Abson, Kim Gittere	2/23/02	1
I2	Agel, Julie	2/28/02	1
I3	Agnew, Meg	2/13/02	1
I4	Alderman, Beth W	2/13/02	1
I5*	Alexander, Jean L	2/25/02	5
I6	Alexander, Johanna	2/27/02	1
I7	Alexander, Keith	2/20/02	1
I8	Alexander, William	2/27/02	1
I9	Alvarez, Roberto	2/7/02	1
I10	Alvord, Rick	2/13/02	1
I11	Anderson, Doug	2/6/02	1
I12*	Anderson, Jeanne	2/17/02	5
I13	Anderson, John	2/13/02	1
I14	Andrus, Joel	2/13/02	1
I15	Arbios, Bob	2/20/02	1
I16	Argens, Jeff	2/13/02	1
I17	Arvey, Richard & Evelyn	2/26/02	1
I18	Backus, Carol & Ned	2/12/02	3
I19	Bagley, Meridith	2/26/02	2
I20	Baker, Shelly	2/26/02	2
I21	Balogh, Jessica R	2/27/02	1
I22	Banse, Liz	1/23/02	1
I23	Bauer, William	2/27/02	1
I24	Beaver, Margaret	2/24/02	1
I25	Benner, Jay	2/19/02	1
I26	Bingaman, Gariann	2/28/02	1
I27	Bishop, Jill	2/27/02	1
I28	Blau, Herbert	2/8/02	1
I29	Blukis, Andrea	2/13/02	1
I30	Boelter, Allison	2/25/02	1
I31	Borisch, Mary	2/14/02	1
I32	Bowen, Bryan	2/27/02	1
I33	Bowman, Stephanie	2/27/02	2
I34	Bracht, Dana	2/27/02	2
I35	Brackhan, Kimberly	2/26/02	2
I36*	Brady, Ed	2/26/02	2
I37*	Bragg, Janice & Kirby, Robert	2/26/02	12
I38	Branam, Aron	2/28/02	1
I39	Brennan, Steve	2/15/02	2
I40	Brillhart, Kimberly & Lee	2/25/02	1
I41*	Brown, R A	2/28/02	4
I42	Brown, Suzanne	2/20/02	1
I43	Bruce, Karen	2/17/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I44*	Brundrett, Peter & Lemaitre, Rozenn	2/26/02	9
I45	Buehrens, Paul	2/11/02	3
I46	Bush, Kristen	2/11/02	4
I47	Bush, Stephen	2/14/02	2
I48	Butler, Henry & Olga	2/20/02	1
I49	Callaghan, Rommie	2/13/02	1
I50	Carney, Mike	2/13/02	1
I51*	Carpenter, Alan & Leslie	2/28/02	10
I52	Carr, Francine & Robb	2/17/02	1
I53	Cartano, Maureen	2/6/02	1
I54	Chaffee, Anthony	2/28/02	1
I55	Chaffee, Livingston	2/14/02	1
I56*	Chetrick, Diane	2/28/02	1
I57	Cholvin, Valerie	2/28/02	1
I58	Christakis, Dimitri	1/28/02	1
I59	Claeys, Tom	2/6/02	1
I60	Cloutier, Janet	2/28/02	2
I61*	Cone, Kristopher & Patricia	2/3/02	6
I62	Cone, Stephanie	2/10/02	1
I63*	Conlon, Joan Catoni	2/6/02	3
I64	Cook, Brent	2/26/02	2
I65	Couglin, Kerry	2/27/02	1
I66	Crudo, Rick	2/8/02	1
I67*	Cutler, Ben	1/27/02	6
I68*	Dahl, Gail	2/6/02	8
I69*	Dahl, Peter	2/9/02	2
I70	Davis, Kate	2/13/02	1
I71	Davis, Tania M	2/28/02	1
I72*	d'Hondt, Mary-Thadia	2/5/02	5
I73	DiLanzo, Suzanne	2/15/02	1
I74	Dixon, Andrea	2/28/02	1
I75	Drackert, Amy	2/27/02	2
I76	Ducey, Hannah	2/27/02	1
I77	Ducey, Mike	2/27/02	1
I78	Duncan, Richard	2/18/02	1
I79*	Dwiggins, Pam	2/1/02	6
I80*	Eberhardt, Christian	2/12/02	3
I81	Erdman, Eric	2/13/02	1
I82	Evans, Joe	2/18/02	4
I83	Ewen, Robert	2/13/02	1
I84	Fallon, Gary	2/6/02	1
I85*	Farley, Kimberly	2/24/02	19
I86	Farmer, Bill & Laurie	2/26/02	1
I87	Felker, Bradford	2/15/02	1
I88	Finn, Steve	2/25/02	1
I89*	Firestone, Bruce	1/24/02	3

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I90	Fleagle, Robert	2/7/02	1
I91	Flenniken, Kathleen	2/13/02	1
I92	Flynn, Chad	2/13/02	1
I93	Forfylow, Dana	2/14/02	3
I94	Forrest, Judith	2/15/02	1
I95*	Frederick, Hans	2/28/02	5
I96	Freeman, Scott	2/5/02	1
I97	French, Jason	2/7/02	1
I98	Friedrich, Susie & Alex	2/19/02	1
I99*	Friel, Patrick	2/9/02	1
I100	Fukushimas The	2/28/02	1
I101	Gabella, Daminique	2/20/02	1
I102	Gagliardo, Jill	2/15/02	3
I103*	Gahringer, Betty	1/29/02	1
I104*	Gamble, Gaile	2/24/02	1
I105*	Gardow, Kathryn	2/21/02	1
I106*	Garrett, Alden	2/28/02	1
I107*	Gerber, Lane & Joanna	2/16/02	1
I108	Giampietro, Joseph	2/6/02	1
I109	Gilbertson, Debra	2/12/02	1
I110	Giles, Tony	2/19/02	1
I111	Godfrey, Debra	2/14/02	1
I112	Goeltz, Ben	2/13/02	1
I113	Gorman, Gloria	1/29/02	1
I114	Gotz, Paul	2/6/02	1
I115	Gray, Lee	2/19/02	1
I116	Green, Rick & Lisa	2/3/02	1
I117	Guttorp, Peter	2/13/02	1
I118	Hampsch, Bess	2/14/02	4
I119*	Hance, Judith	1/29/02	3
I120	Hanson, Brian	2/6/02	1
I121*	Hashimoto, David	N.D.	7
I122*	Hashimoto, Molly	2/6/02	5
I123	Havkins, Sabina	2/23/02	1
I124	Haynes, Chris	2/14/02	2
I125	Hegarty, Pat	2/4/02	1
I126	Helman, Jon	2/13/02	2
I127	Hendricks, Andy	2/11/02	1
I128	Hennessey, James	2/6/02	1
I129	Heritage, Doris Brown	2/21/02	1
I130*	Hill, Loren	2/28/02	1
I131	Hoekstra, Gale	2/13/02	1
I132	Hoffman, Harry	2/6/02	1
I133	Holme, Terry	2/10/02	1
I134	Hongladarom, Jon	2/21/02	1
I135	Hopkins, Teresa	2/25/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I136	Howland, Amy	2/15/02	3
I137	Hudson, Gail	2/6/02	1
I138	Hughes, James	2/13/02	1
I139	Iannucci, Nancy	2/13/02	1
I140	Ingman, Robert	2/6/02	1
I141	Jacobson, Michael	2/19/02	1
I142	Jager, Steve	2/6/02	1
I143	Johnsen, Janice & Jim	2/3/02	1
I144	Johnson, Jamarr	2/15/02	1
I145	Johnson, Jeff	2/28/02	1
I146*	Jones, Ron	2/4/02	6
I147	Kalitzki, Judi	2/12/02	1
I148*	Keller, Susanne & Williams, Allen	2/4/02	2
I149*	Kelly, Tom	2/26/02	7
I150	Kennedy, Stacie	2/19/02	2
I151	Kirk, Elizabeth	2/14/02	2
I152	-- (number skipped)	--	--
I153	Kliman, Jed	2/16/02	1
I154	Koga, Kevin	2/7/02	1
I155*	Korg, Jacob	2/5/02	7
I156	Kotler, Lou & Levy, Phyllis	2/7/02	1
I157	Krakauer, Wendy	2/5/02	1
I158	Kraybill, Ken	2/3/02	1
I159*	Kupor, Bob	1/29/02	1
I160	Kurland, Brenda	2/15/02	1
I161	Lamb, Jane	2/27/02	1
I162	Landicho, Helen	2/6/02	1
I163*	Lang, Susan	2/15/02	1
I164	Lansdaal, Michael T	2/28/02	1
I165	Larson, Dan	2/17/02	1
I166*	Lasley, Mary	2/27/02	4
I167*	Lasley, Scott	2/25/02	See I166
I168	Latimer, Stephen	2/6/02	1
I169	Lauren, Rob	2/14/02	2
I170	Lawson, Debbie	2/13/02	1
I171	Leehr, Jon	2/15/02	1
I172*	Lennartz, Ann	2/28/02	3
I173*	Lester, Anne	2/28/02	3
I174	Levy, Phyllis	2/7/02	1
I175	Lewis, Dominique	2/28/02	1
I176*	Li, Mary & Joseph	2/4/02	1
I177*	Libby, H K	2/11/02	1
I178	Lin, Elizabeth	2/8/02	1
I179	Locke, Lynda	2/15/02	1
I180	Lockridge, Pat	2/27/02	2
I181	Longton, Gary	2/27/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I182	Loudenback, Shawn	2/28/02	1
I183	Lubov, Maggi	2/17/02	1
I184	Lyons, Richard	2/7/02	1
I185*	Madden, L James	2/14/02	1
I186	Magee, Dave	2/8/02	1
I187	Manasse, Geoff	2/12/02	1
I188*	Manos, Janet	2/25/02	4
I189*	Manos, Nancy	2/25/02	See I188
I190	Marks, Michael	2/14/02	2
I191	Martin, Jon	2/27/02	1
I192	Martin, Michael	2/20/02	1
I193*	Martynowych, Denis	2/18/02	5
I194	Maxwell, Jeff D	2/13/02	1
I195	McCallum, Chris	2/28/02	1
I196	McDonald, Jennifer	2/25/02	1
I197*	McDonald, Judy Manos	2/25/02	See I188
I198	Merrihew, Alan K	2/14/02	1
I199	Mesenbrink, Susan	2/13/02	1
I200	Michel, Mariana	2/26/02	1
I201	Miele, Katie	2/15/02	2
I202	Millan, Ted	2/14/02	1
I203	Millard, Steven	2/13/02	1
I204*	Miller, Alan K	2/16/02	1
I205*	Miller, Bonnie	2/27/02	4
I206	Miller, David C	2/5/02	1
I207	Mishler, Meagan	2/28/02	1
I208	Moore, Aaron	2/14/02	1
I209*	Morgan, Kate	2/24/02	19
I210	Moriarty, Jim	2/6/02	1
I211	Mucciarone, John	2/6/02	1
I212	Mulberg, Ronald C	2/13/02	1
I213	Muller, Eric	2/17/02	1
I214	Munske, Randal D	2/19/02	1
I215*	Murray, Bill	2/11/02	5
I216	Myers, George	2/13/02	1
I217	Narby, Timothy	2/13/02	1
I218	Nash, Jeremy	2/28/02	1
I219	Nash, Lawrence	2/28/02	1
I220*	Nelson, Elizabeth	2/15/02	3
I221*	Nemitz, Marsha	1/28/02	9
I222	Nevers, Barbara	2/13/02	1
I223	Nichols, Nancy F	2/13/02	1
I224	Nielsen, Louis	2/12/02	1
I225	Nolin, Jessica	2/27/02	2
I226	Nolkamper, Jennifer	2/14/02	1
I227	Noonan, Shiela B	2/14/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I228	Nordhoff, Chuck	2/6/02	2
I229*	Novotny, Patricia	2/13/02	1
I230	O'Brien, Debi	2/15/02	1
I231	Ochi, Rex & Placida	1/21/02	1
I232*	Okigwe, Carla	1/29/02	4
I233	Osborne, William	2/13/02	1
I234	Paden, Jeff	2/7/02	1
I235	Parish, Craig "Wags"	2/14/02	2
I236	Parker, Micah	2/9/02	1
I237	Parker, R Wayne	2/15/02	1
I238	Parks , Josh	2/6/02	2
I239	Patterson, Russell H	2/13/02	1
I240	Pelkey, Shannon	2/11/02	1
I241	Pelton, David	2/22/02	1
I242	Pennington, Robyn	2/14/02	2
I243	Perko, Andrew	2/28/02	1
I244	Pfeiffer, Natasha	2/14/02	3
I245	Phillips, Debby	2/13/02	1
I246	Phillips, John & Debby	2/13/02	1
I247	Phillips, Kevin	2/15/02	1
I248*	Phillips, Richard O	2/20/02	1
I249	Pigott, Kelly	2/5/02	1
I250	Ramey, Jodie	2/19/02	2
I251	Ramsey, Jason	2/15/02	2
I252	Read, Tracy	2/13/02	1
I253*	Reed, Kristine	2/2/02	4
I254*	Rench, Bob	2/28/02	7
I255	Renkert, David	2/15/02	1
I256	Richards, Russ	2/20/02	1
I257	Riday, Rick & Lani	2/28/02	1
I258*	Robbins, Jeff	2/28/02	1
I259*	Roberts, Myrna	2/27/02	4
I260*	Rose-Leigh, Rob & Barbara	2/20/02	2
I261*	Rosenberg, Robert & Fein, Jane	1/27/02	1
I262*	Rost, Liza	2/25/02	1
I263	Rothrock, Stephen	2/7/02	1
I264	Roy, Hilary M	2/27/02	2
I265	Roy, Monica	2/28/02	1
I266*	Russell, Diana	2/24/02	11
I267	Sampson, Dick & Marge	2/24/02	1
I268*	Sandall,Marilyn	2/28/02	11
I269*	Sandell, Claire et al.	2/24/02	1
I270	Sarbach, Mark	2/13/02	2
I271	Sauvage, John	2/7/02	1
I272	Schaal, Deborah	2/14/02	4
I273*	Schellenberg, Evelyn	1/30/02	2

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I274	Schoener, Matt	2/28/02	1
I275	Schollaert, Tony	2/14/02	2
I276	Schulze, Travis	2/14/02	4
I277	Schwartz, Jay	2/6/02	1
I278	Sears, Gena	2/13/02	1
I279	Sharp, Douglas F	2/14/02	1
I280*	Sherman, Cathy Manos	2/25/02	See I188
I281*	Sherman, Helen L	2/27/02	4
I282*	Sherman-Peterson, Ron & Deejah	2/26/02	3
I283	Shickich, Joe	2/6/02	1
I284*	Shimada, Justin & Fay	2/25/02	4
I285*	Shives, Fletcher G	2/28/02	12
I286	Shores, Clell	2/27/02	1
I287	Sibley, Randy	2/9/02	1
I288*	Sienkiewicz, Joan & Chuck	2/21/02	5
I289	Sigley, Robert	2/13/02	1
I290	Simpson, Rob	2/16/02	1
I291	Siscel, Paul	2/14/02	1
I292*	Skaar, Al	2/14/02	13
I293	Smalley, Royal	2/27/02	1
I294	Smith, Carol	2/6/02	1
I295	Smith, Marina L	2/28/02	1
I296*	Smith, Maureen	2/27/02	5
I297*	Smith, Scott	2/27/02	2
I298	Sommerville, Andrew	2/13/02	1
I299*	Sorensen, Cheryll	2/7/02	6
I300	Sorensen, Tyra	2/15/02	1
I301*	Spelman, Francis	2/28/02	5
I302*	Spelman, Kay D	2/28/02	See I301
I303	Sporleder, Jennifer L	2/14/02	4
I304	Squires, Randy	2/14/02	1
I305	Stamm, Andrea	2/14/02	3
I306	Stein, Alex	2/14/02	1
I307*	Stein, Eugene	2/22/02	5
I308*	Stemp, Ralph	1/22/02	1
I309*	Stevens, Alexander	1/29/02	4
I310	Stevenson, Pete	2/26/02	2
I311*	Stewart, Carol	1/18/02	3
I312	Stodden, David	2/6/02	1
I313	Storch, Laila	2/28/02	1
I314	Strauss, Bob	2/8/02	1
I315	Strom, Alex	2/14/02	4
I316*	Swedberg, Nicole	2/6/02	2
I317*	Swedberg, Steven	2/7/02	2
I318	Symington, Allen E	1/31/02	1
I319	Takagi, Mark	2/7/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I320	Taniguchi, Diane F	2/28/02	1
I321	Tanner, Jen	2/15/02	6
I322	Tax, Brian	2/13/02	3
I323	Taylor, Mac	2/7/02	1
I324	Terhaar, Paula	2/12/02	1
I325	Tetler, Jen	2/19/02	3
I326	Thomas, Wendy	2/6/02	1
I327	Thomassen, Scott	2/24/02	1
I328*	Thompson, Vance	2/10/02	3
I329	Thornley, Rodney	2/6/02	1
I330	Timpe	2/9/02	1
I331	Tonkovich, Jerry & Debbie	2/16/02	1
I332	Toth, Elizabeth	2/4/02	1
I333*	Trafford, Claudine	2/4/02	18
I334*	Tremaine, Dorian	2/27/02	9
I335	Tsuchiya, Ami	2/15/02	2
I336	Tuesley, Bruce	2/6/02	1
I337*	Tulchinsky, Mrs.	2/4/02	3
I338*	Turnbull,John	1/10/02	2
I339	Turton, Tricia	2/14/02	1
I340	Twohey, Sean	2/13/02	3
I341	Ursino, Tony	2/27/02	1
I342*	Vanderwilt, William & Catherine	2/13/02	5
I343*	Van Horn, M Lee	2/20/02	4
I344	Van Vuren, Karen	2/25/02	1
I345	Vaughan, Tom V	2/25/02	1
I346	Veatch, Sarah	2/28/02	1
I347*	Verrilli, John	2/10/02	1
I348	Vick, Cynthia	2/28/02	1
I349	Wacker, Paul	2/12/02	1
I350	Wagner, Nick	2/25/02	1
I351	Walker, Gabriele	2/27/02	2
I352	Walker, Suzanne	2/28/02	1
I353	Walser, John	2/6/02	1
I354*	Wan, Y L	2/27/02	4
I355	Wass, Greg	2/21/02	1
I356*	Weaver, Neale	1/31/02	2
I357*	Webb, Eugene	2/24/02	4
I358*	Webb, Marilyn D	2/24/02	3
I359	Weiler, Jason	2/19/02	1
I360	Weinburg, Lucy	2/14/02	1
I361	Weiss, Marge	2/4/02	1
I362	Whalen, Jason	2/5/02	3
I363	Whatley, Linda & Tony	2/7/02	1
I364	Whitehead, Kenia	2/13/02	3
I365	Whitman, Heidi	2/14/02	1

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Individual	Date of Record	No. of Comments
I366*	Whitmann, Edward & Gwendolene	1/31/02	2
I367*	Wolman, Alec & Yvonne	2/28/02	6
I368	Woodman, Mike	2/14/02	1
I369	Wright, Robert E	2/13/02	1
I370	Wyatt, Jenny	2/6/02	1
I371	Ziebarth, Scott A	2/27/02	1
I372	Zieve, Peter	2/13/02	1
I373*	Ziker, Barry	2/15/02	2

4. Testimony Comments

Comment Record ID	Speaker	Affiliation	No. of Comments
T1*	Stevens, Alex		4
T2*	Lucas, Bob		6
T3*	Simpkins, Jim		See O8
T4*	Santos, Bob		2
T5*	Barton, Renee		7
T6*	Hashimoto, Molly		See I122
T7*	Dahl, Gail		See I68
T8*	Curl, Herbert Jr.		5
T9*	Hashimoto, David		See I121
T10*	Braden, Lauren		See O15
T11*	Sandall, Marilyn		6
T12*	Brundred, Peter (Brundrett)		3
T13*	Ruh, Gordon		7
T14*	Williams, Jeanette		2
T15*	Tremaine, Dorian		6
T16*	Thompson, Vance		4
T17*	Shives, Fletcher		5
T18*	Cranshaw, Aquilla		4
T19*	Seet, Denika		3
T20*	Eckerman, Greg		See O12
T21*	Dahl, Peter		1
T22*	Swedberg, Nicole		See I316
T23*	Kroening, Nancy		9
T24*	Mesenbrink, Susan		4
T25*	Fenton, Theresa		6
T26*	Skaar, Al		3
T27*	Kelly, Tom		See I149
T28*	Cope, Karly		5
T29*	Russell, Diana		See I266
T30*	Welch, Cheryl		1
T31*	Kuper, Sara		2
T32*	Lee, Sharon		4
T33*	Alexander, Jean		2

Table 4-1
Draft EIS Comment Log (cont'd)

Comment Record ID	Speaker	Affiliation	No. of Comments
T34*	Lester, Anne		1
T35*	Boelter, Allison		3
T36*	Shepherd, Judy		1
T37*	Murray, Bill		2
T38*	Stuvey, Eric		3
T39*	Lundgren, Stephan		2
T40*	Carpenter, Alan		See I151
T41*	Martin, Michael		6
T42*	Stevens, Jane		3
T43*	Schulkin, Susan		3
T44*	Miller, Bonnie		7
T45*	Gerber, Lane		9
T46*	Lloyd, Kate		5
T47*	Teshima, Joyce		4
T48*	Barton, Justine		3
T49*	Arp, Gwen		2
T50*	Wells, Kim		2
T51*	Lodge, Mark		3
T52*	Thompson, Alexa		3
T53*	Welch, Sheryl		See T30
T54*	Jones, Bodil		1
T55*	Arp, Benjamin		5

Table 4-2
Issues Based on Draft EIS Comments

Issue Code	Summary of Issue	Applicable Comments
	PROGRAMMATIC/POLICY ISSUES	
SEPA	**SEPA/EIS Process & Scope**	
1.	Off-site alternative/alternative sites – whether the Draft EIS included or should have included evaluation of an off-site alternative, as required under SEPA for public projects.	O2-2, O7-7, O13-8 I44-8, I51-6, I68-6, I85-15, I121-3, I155-6, I193-1, I209-11, I209-19, I221-8, I254-2, I266-4, I266-10, I266-11, I268-11, I285-3, I288-1, I292-2, I292-8, I296-5, I333-4, I333-7 T17-3, T41-3, T44-7
2.	Definition of EIS alternatives – primarily, whether the lesser-capacity alternative evaluated in the Draft EIS met the SEPA definition of an alternative.	O2-3, O7-7 I51-5, I85-1, I85-13, I149-1, I163-1, I266-5, I285-4, I333-8 T17-4, T32-3, T35-2, T42-3, T44-1, T51-1, T55-2
3.	Alternatives not evaluated in the Draft EIS - why were other action alternatives not evaluated in the Draft EIS? Specific suggestions included alternatives with all natural turf instead of artificial turf; alternatives without lighting, or with significantly reduced lighting; alternatives changed to reduce impacts; reduced numbers of fields; and leaving the park as natural as possible while maintaining multiple use.	O2-1, O2-4, O8-5, O10-3, O12-6, O13-3, O14-2, O14-3, O15-32, O16-4 I5-3, I12-4, I37-7, I51-1, I56-1, I79-6, I85-14, I89-3, I99-1, I149-5, I155-6, I173-3, I177-1, I188-1, I193-5, I209-13, I209-19, I259-3, I266-5, I266-10, I268-11, I292-13, I299-6, I307-2, I334-9, I342-5, I367-5 T11-5, T13-1, T15-4, T23-1, T41-3, T41-4, T42-3, T45-1, T46-1, T47-2, T49-2
4.	Adequacy of the Draft EIS – an issue represented by comments that a Supplemental EIS should be prepared, that the current DEIS is inadequate and/or justifies the plan rather than analyzes it, or that there should be equal treatment of alternatives.	A6-1 O2-19, O13-2, O14-11 I41-1, I44-1, I80-3, I155-1, I188-3, I209-1, I209-10, I254-7, I285-1 T25-5, T25-6, T31-1, T32-1, T41-1, T41-2, T51-2, T55-4
5.	Sufficiency of EIS scope with respect to other Sand Point Magnuson Park projects – comments maintaining that environmental analysis of multiple projects at Sand Point Magnuson Park is being piece-mealed, that this EIS should be a comprehensive review of all projects proposed for the park.	O6-2, O7-6, O14-1, O15-2, O15-11, O15-20, O17-5 I12-1, I68-5, I85-5, I209-7, I209-12, I220-1, I221-6, I232-1, I266-7, I268-8, I268-10, I285-8 T5-5, T8-4, T15-2, T17-1, T44-6, T55-5
6.	EIS scope with respect to economic impacts – comments that the EIS should analyze impacts of the sports field lights on surrounding property values, and the financial impact of injuries and lawsuits due to use of artificial turf.	O10-2, O10-6 I12-4, I67-6, I72-5, I146-5, I266-9, I284-1, I292-7, I337-3, I354-4, I357-4, I358-3 T2-4, T37-1, T52-2
7.	EIS scope with respect to quality of life impacts – comments that quality of life concerns and/or that social/cultural impacts were not addressed in the DEIS.	O13-1 I67-5, I72-4, I79-1, I89-1, I188-4, I292-6, I292-7, I354-4
8.	Sufficiency of mitigation measures – comments that mitigation measures identified in the Draft EIS were not sufficient to address the impacts, or general or specific comments for more mitigation.	O13-3 I209-16, I221-7, I268-9 T11-5

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	PROGRAMMATIC/POLICY ISSUES	
SEPA	**SEPA/EIS Process & Scope (continued)**	
9.	Necessary permits for the proposed action – a question whether the project would need a permit under Section 404 of the Clean Water Act.	O15-8
10.	Implementation of a City light restriction ordinance – comments that the City would be contributing to light pollution and/or should implement a light restriction ordinance.	O2-17 I121-4, I188-4, I209-18
11.	Allocation of City funds – comments criticizing the City's proposal to earmark $12 million for the park instead of using it for other purposes, or expressing concern over the financial ability to maintain the project.	O2-14 I44-9, I146-1, I166-4, I176-1, I215-5, I259-4, I292-12, I307-5, I333-5, I333-12, I333-17 T18-3, T45-7
12.	Consistency of proposed uses with terms of the Navy transfer of the property to the City, or with the content of prior EISs addressing the transfer.	I51-9, I285-9 T32-4
13.	Lead agency/NEPA jurisdiction over the project – comments pertinent to the question of why the EIS was not a NEPA document with the Corps of Engineers as lead agency.	A6-2 I85-2
14.	Sufficiency of agency coordination and participation, particularly by federal and state resource agencies, in the SEPA process.	I85-8
15.	Sufficiency of public notice and opportunity for input – comments regarding public notification of the EIS meetings, whether public input would be ignored, requests for records and an extension of the comment period, or the availability of DEIS copies for review.	I85-9, I282-2, I285-2 T23-5
16.	Documentation of baseline environmental conditions – comments critical of the DEIS mapping of baseline conditions.	I85-10, I85-12, I85-16
17.	Approval process and timing for related park plans – comments questioning the relationship between this proposal and the Joint Athletic Facilities Development Program, or the vegetation management plan for the park.	I328-1, I328-3 T13-6, T16-3, T39-2, T45-8
PD	**Project Description**	
1.	Sufficiency of information on construction phasing – a variety of comments relating to the phasing of project construction. This category also includes questions about funding availability relative to the phasing plan, or the timing of specific construction activities.	O15-10, O15-19 I37-6, I172-1, I205-2, I209-17, I308-1 T8-2
2.	Suitability of proposed fill soil – comments questioning whether the soil mixture proposed for landscaping and fields was consistent with standards, or whether on-site material was suitable for subgrade use .	A4-1 O15-9, O15-21

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	PROGRAMMATIC/POLICY ISSUES	
PD	**Project Description (continued)**	
3.	Size, shape and function of the proposed marshy ponds – comments about the geometry of the marshy pools proposed for an area of the wetland/habitat complex.	A7-10 O15-13
4.	Level of detail on landscaping, irrigation and planting plans –requests for more details about the irrigation system, planting plans for landscaping and wetlands, use of native species, etc.	A4-2, A4-3, A7-8 O1-3, O7-3, O15-3, O15-6, O15-13, O15-18 I85-18, I172-2, I205-1, I268-1, I268-4 T8-3, T44-5
5.	Level of information on plans for sports fields – comments primarily relating to the proposed field surfaces, including questions about how the selection of artificial-turf fields was made, whether life cycle costs were evaluated, field size, field availability for specific uses, and how to dispose of worn-out artificial turf.	A1-1, A4-8 I37-8, I95-3, I334-7
6.	Wetland design and characteristics – comments about treatment of specific habitat features for the wetland and upland habitats, and the proposed lagoon location.	A7-9 I36-1
7.	Type of fill material for site construction – comments questioning the use of existing on-site crushed paving materials as fill for the sports fields, or the consequences of that use.	O7-5 I334-5 T5-6
8.	Provisions for bicycles and pedestrians in park transportation plan – comments addressing a need to include bicycles and pedestrians in the Park transportation plan, to separate bicycles from pedestrian on trails for safety, or similar concerns.	O14-5, O14-6 I95-5, I173-1, I261-1 T14-1
9.	Selection/description of elements of the lighting system – various specific issues relating to the sports field lighting component of the proposed action. This category includes comments about the appropriate lighting standard, site-specific location of light fixtures, use of 1500W lamps, use of lighting systems with variable brightness levels, and types of lighting technologies.	O3-3, O6-1, O11-3, O15-31, O16-2, O16-3 I204-1, I281-4, I309-2, I316-2 T5-4
10.	Requested changes or additions to the proposed action – a wide range of comments about various elements of the proposal or suggested additions, such as restaurants, playgrounds, bikeways and in-line skating facilities.	I104-1, I105-1, I106-1, I130-1, I185-1, I232-2, I258-1, I338-1, I347-1, I366-2
11.	Comparison to lighting system at Safeco Field – comments comparing lighting for the proposed project to Safeco Field (the Seattle major-league baseball stadium).	I328-2 T16-1, T23-8

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	ELEMENT/RESOURCE ISSUES	
GEO	**Earth**	
1.	Potential for soil contamination on the project site - and need for soil and groundwater sampling.	A8-1
2.	Description of landscaping impacts.	A4-5
AQ	**Air Quality**	
1.	Barge transport for site fill material - to decrease noise and air quality impacts.	A2-1
2.	Demolition requirements relative to asbestos.	A2-2
3.	Control of dust emissions from construction.	A2-3
WTR	**Water**	
1.	Impacts of project water consumption - how much would be used for irrigation, bathrooms, fodd facilities, pool, etc.	A4-4, A4-6, A4-10, A4-16
2.	Use of chemicals to clean fields - and need to treat runoff.	A4-9, A4-12
3.	Measures to promote water quality, waste reduction and conservation.	A4-11, A4-13
4.	Need for monitoring of stormwater runoff and related comments on treatment needs.	A7-5, A7-7 O1-4, O7-6, O15-11, O15-13 I12-3, I37-5, I61-4, I85-7, I209-9, I268-10, I334-4 T23-7
5.	Impervious surface acreage data - clarity and consistency of numbers used throughout the document.	A7-6 I85-11, I85-19
6.	Basis and feasibility of the site drainage design.	A4-14 O15-12 T5-7
7.	Water levels in the proposed lagoon.	O15-15
WET	**Plants and Wetlands**	
1.	Post-construction monitoring of wetland/habitat creation - and maintenance to fix anything that is not working.	O1-2, O15-1, O15-25 I37-3, I122-1, I172-3, I268-5 T8-5
2.	Sufficiency of information on mitigation for wetland impacts - comments on wetland delineation, mitigation for net loss of wetlands, gain of manmade habitat but loss in wild habitat, or expanding sports meadow area.	A7-1 O1-6 I37-2, I85-3, I85-6, I85-17, I95-2, I220-2 T44-4, T46-4
3.	Human disturbance and related impacts to wetlands.	A7-2 O1-1, O15-23 I146-4, I148-1, I209-9, I285-11, I333-3, I334-6
4.	Need for herbicide use on athletic fields.	A7-4
5.	Clarity of some species identifications.	O15-22
6.	Need for amendment of disturbed wetland soil.	A4-14
7.	Location of sports fields relative to wetland area.	I36-2

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	ELEMENT/RESOURCE ISSUES	
WDLF	**Wildlife/Fish**	
1.	Impacts of lighting/human disturbance on wildlife - comments about need for more analysis in the EIS, many species affected, or adequacy of mitigation offered.	A7-3 O1-5, O2-15, O2-16, O7-1, O8-2, O14-8, O15-7, O15-14, O15-17, O15-26, O15-27, O15-29, O15-33, O16-1, O16-5, O17-2 I37-9, I41-2, I61-3, I67-4, I68-1, I103-1, I119-3, I122-3, I146-3, I148-1, I149-3, I193-4, I209-5, I215-1, I215-4, I221-1, I221-2, I221-4, I229-1, I254-6, I266-1, I266-8, I268-2, I282-1, I284-3, I288-4, I296-3, I299-2, I301-4, I309-2, I309-4, I311-3, I333-2, I333-13, I333-18, I334-6, I342-3, I356-2, I367-4 T1-3, T5-1, T11-2, T11-3, T13-3, T13-7, T15-3, T15-6, T23-2, T28-2, T33-2, T43-3, T45-5, T46-3
2.	Displacement of existing wildlife.	O2-18 I12-5, I334-8
3.	Characteristics of on-site trails.	O7-2, O15-16
4.	Effect on designation of park as an environmentally critical area for wildlife.	O15-4
5.	Control of user behavior/enforcement of park rules.	O15-24 I149-6
6.	Impact of lagoon on fisheries in area - comments about impact to the lake bottom, summer water temperatures and predation.	I12-2, I37-4, I285-12
7.	Information on endangered species and ESA compliance.	I85-4
8.	Construction impacts on frogs.	I122-4
ENR	**Energy and Natural Resources**	
1.	Electric energy and water consumption - comments that power and water consumption were not adequately addressed in the EIS, or that the project would be a waste of energy.	A4-15 O14-9, O15-30 I37-11, I44-4, I51-3, I51-10, I149-4, I176-1, I188-4, I209-18, I273-2 T14-2, T44-2
NOI	**Noise**	
1.	Operational noise from use of fields - a variety of comments about noise readings in surrounding neighborhoods, the hillside acting as an amphitheater, noise levels at night, noise impacts to on-site residents, and documentation of past noise complaints.	O2-10, O2-11, O8-4, O12-3, O13-5, O14-10, O16-7, O17-4 I44-6, I61-5, I68-2, I68-8, I69-2, I79-3, I79-4, I80-1, I121-5, I121-7, I148-1, I149-7, I155-4, I176-1, I193-3, I209-3, I209-14, I215-1, I215-4, I221-4, I232-4, I248-1, I253-2, I24-5, I259-2, I260-2, I266-3, I266-8, I268-6, I269-1, I285-10, I292-10, I296-2, I299-4, I301-2, I307-4, I311-2, I316-1, I333-11, I333-16, I334-1, I337-2, I343-2, I354-1, I367-5, I373-1 T2-2, T2-6, T13-4, T18-4, T19-3, T21-1, T23-4, T24-3, T26-1, T38-1, T41-5, T42-1, T43-2, T44-3, T45-4, T47-4

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	ELEMENT/RESOURCE ISSUES	
NOI	**Noise (continued)**	
2.	Provisions of and compliance with City Noise ordinance.	O2-12 I51-4, I51-8, I209-2, I292-11
3.	Treatment of impacts from construction noise.	O2-13 I301-3 T4-2, T24-1
4.	Adequacy of mitigation for noise impacts.	O12-4, O13-6 I221-5, I268-7
LU	**Land Use**	
1.	Consistency with park designation as an environmentally critical area.	O15-4
AES	**Aesthetics**	
1.	Impacts on views of the lake and Magnuson Park.	I5-1, I37-10, I37-12, I44-7, I61-1, I67-2, I281-3, I284-4, I357-3, I358-2 T12-3, T28-4, T43-1, T46-2
L&G	**Light & Glare**	
1.	Methodology used to assess light and glare impacts - comments about specific factorsd or measures used to assess impacts, or need to consider visual perception of light, especially at night.	O2-6, O2-7, O2-8 I51-2, I51-7, I121-1, I209-4, I209-15, I285-6, I317-2 T13-5, T16-4, T17-5, T25-2, T25-4, T55-1
2.	Characterization or acceptability of light and glare impacts - comments objecting to the Draft EIS description of light and glare impacts or conclusions on impact significance, objecting to the proposed hours of operation, or stating that the impacts would be unacceptable.	O2-5, O4-1, O5-1, O8-3, O10-4, O12-1, O12-2, O12-6, O13-4, O14-7, O16-4, O16-6, O17-2 I1-1, I5-2, I5-5, I41-3, I44-3, I61-2, I61-2, I67-3, I68-4, I68-7, I69-1, I72-2, I79-2, I79-5, I80-2, I107-1, I119-1, I121-2, I121-6, I146-2, I146-6, I148-2, I149-2, I155-3, I159-1, I166-1, I173-2, I177-1, I188-2, I193-2, I205-4, I209-6, I209-14, I215-1, I215-4, I220-3, I221-1, I221-3, I221-9, I232-3, I248-1, I253-1, I254-1, I254-3, I258-1, I259-2, I260-2, I262-1, I266-2, I266-6, I266-8, I268-3, I269-1, I273-1, I281-1, I282-1, I284-2, I285-5, I285-7, I288-3, I288-5, I292-1, I292-5, I292-9, I296-4, I297-1, I297-2, I299-1, I301-1, I307-1, I307-3, I309-3, I317-1, I333-1, I333-9, I333-15, I334-1, I342-2, I342-4, I343-3, I354-3, I356-1, I357-1, I358-1, I366-1, I367-1, I367-2, I367-3, I373-1 T1-2, T1-4, T2-3, T4-1, T5-2, T11-6, T12-2, T13-2, T13-4, T13-7, T18-1, T19-1, T25-3, T25-5, T26-2, T28-1, T28-3, T30-1, T33-1, T34-1, T35-1, T38-2, T41-6, T42-2, T43-1, T45-2, T45-9, T46-2, T47-1, T47-3, T48-1, T48-2, T55-1
3.	Consideration of cumulative light and glare impacts.	O15-28 I205-3, I209-7, I266-7, I268-8, I285-8 T11-4, T15-2, T16-2, T17-2, T39-1

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	ELEMENT/RESOURCE ISSUES	
REC	**Recreation**	
1.	Consideration of passive recreation uses and users.	O14-4 I334-2
2.	Scheduling and allocation of time on sports fields - concerns that people living around the park could not use the fields spontaneously.	O17-6 I5-4, I41-4, I166-2, I292-4 T5-3
CUL	**Historic & Cultural Preservation**	
1.	"Level C" review and consultation for demolition of Building 15 (Hobby Shop).	A9-1
TRAN	**Transportation**	
1.	Analysis of impacts to traffic outside of the park - including comments about including additional intersections in the analysis, increased traffic congestion/delays, traffic impacts/volumes being understated, or off-site traffic safety.	A5-1 O2-9, O8-4, O11-1, O15-34, O17-3 I44-5, I63-1, I68-3, I72-3, I122-2, I148-1, I155-2, I176-1, I209-8, I221-7, I248-1, I253-3, I254-4, I258-1, I259-2, I260-2, I269-1, I281-2, I288-2, I296-1, I299-3, I307-4, I333-10, I334-1, I334-3, I337-1, I338-2, I343-2, I354-2, I357-2, I367-5, I373-1 T2-2, T2-5, T12-1, T15-5, T18-4, T19-2, T23-3, T24-2, T24-3, T44-6, T45-3, T46-5
2.	Analysis of impacts to traffic and circulation inside the park - primarily comments about pedestrian access and safety needs in the park.	A5-2 O12-5, O13-7 I253-4
3.	Effects on seasonal parking demands.	I282-3
4.	Promotion of private vehicle use - comments about need for transit access or improvements, or treatment of public transportation in the EIS.	O15-35 I209-8
PSU	**Public Services & Utilities**	
1.	Effects on public safety - concerns about crime and public safety with late night use of lighted fields.	O10-1, O10-5 I155-5, I176-1, I299-5, I373-1 T24-4

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	NON-SUBSTANTIVE COMMENTS	
S/O	**Support/Opposition for the Proposal**	
1.	Support for lighted sports fields - comments indicating support for the field complex, for operating the lights until 11 PM, and/or for 11 lighted fields rather than 7 (as in the lesser-capacity alternative).	A1-2, A1-3 O3-1, O3-2, O9-1 I95-1, I95-4 Individual Comment Records I2, I3, I4, 16, I7, I8, I9, I10, I11, I13, I14, I16, I17, I18, I19, I20, I21, I22, I23, I24, I25, I26, I27, I29, I31, 132, I33, I34, I35, I38, 139, I40, I42, I43, I45, I46, I47, I49, I50, I52, I53, I54, I55, I59, I60, I62, I64, I65, I66, I70, I71, I73, I74, I75, I77, I78, I82, I83, I84, I86, I87, I88, I90, I91, I92, I93, I94, I96, I97, I98, I100, I101, I102, I108, I109, I110, I111, I112, I114, I115, I116, I117, I118, I120, I123, I124, 1125, I126, I127, I128, I129, I131, I132, I133, I134, I135, I136, I137, I138, I139, I140, I141, I142, I143, I144, I145, I147, I150, I151, I153, I154, I156, I157, I158, I160, I161, I162, I163, I164, I165, I168, I169, I170, I171, I174, I175, I178, I179, I180, I181, I182, I183, I184, I186, I187, I190, I191, I195, I198, I200, I201, I202, I203, I206, I207, I208, I210, I211, I212, I213, I216, I217, I218, I219, I222, I223, I224, I225, I226, I227, I228, I230, I233, I234, I235, I236, I237, I238, I239, I240, I241, I242, I243, I244, I245, I246, I247, I249, I250, I251, 1252, I255, I256, I257, I263, 1264, I265, I267, I270, I271, I272, I274, I275, I276, I277, I278, I279, I283, I286, I287, I289, I290, I291, I293, I294, I295, I298, I300, I303, I304, I305, I306, I310, I312, I314, I315, I318, I319, I320, I321, I322, I323, I324, I325, I326, I327, I331, 1335, I336, I339, I340, I341, I344, I345, I346, I348, I349, I350, I351, I352, I353, I355, I359, I360, I361, I362, I363, I364, I365, I368, I369, I370, I371, 1372
2.	Support for wetland creation/restoration - comments indicating support for the wetland/habitat complex, features such as the education shelter, or general support for green space.	O7-4, O11-4, O15-5 I89-2, I258-1 T8-1, T23-6, T51-3
3.	Support for the lesser-capacity alternative.	O11-2 I231-1, I373-2

Table 4-2 (cont'd)

Issue Code	Summary of Issue	Applicable Comments
	NON-SUBSTANTIVE COMMENTS	
S/O	**Support/Opposition for the Proposal (continued)**	
4.	Opposition to the proposed action - comments objecting to the proposal in general or to various parts of the proposal, primarily lighted sports fields.	O8-1, O16-8, O17-1 I37-1, I44-2, I61-6, I63-3, I67-1, I72-1, I119-2, I155-7, I166-3, I209-18, I215-2, I215-3, I248-1, I259-1, I260-1, I266-11, I269-1, I292-3, I301-5, I333-6, I333-14, I342-1, I343-1, I367-6 T1-1, T2-1, T11-1, T18-2, T23-9, T25-1, T26-3, T28-5, T31-4, T32-2, T35-3, T37-2, T38-3, T48-3, T49-1, T50-1, T52-1, T52-3, T54-1, T55-3, T55-4 Individual Comment Records I15, I28, I30, I48, I57, I58, I99, I113, I192, I199, I214, I313, 1332
5.	Support for the no action alternative.	I122-5, I311-1, I343-4 T15-1

4.1 PROGRAMMATIC/POLICY ISSUES

4.1.1 SEPA/EIS Process and Scope (SEPA)

Issue SEPA 1: Off-site alternative/alternative sites

Issue: A number of comments raised the issue that an off-site alternative was not analyzed in the Draft EIS for this project. Numerous comments stated that this project is classified as a "public" project, and, therefore, the Department of Parks and Recreation is required by SEPA to evaluate an off-site alternative in the EIS. Most of the comments in this category reflected concerns over impacts to the surrounding neighborhoods.

Applicable Comments: O2-2, O7-7, O8-5, O13-8, I44-8, I51-6, I68-6, I85-15, I121-3, I155-6, I193-1, I209-11, I209-19, I221-8, I254-2, I266-4, I266-10, I266-11, I268-11, I285-3, I288-1, I292-2, I292-8, I296-5, I333-4, I333-7, T17-3, T41-3, T44-7

Response:

The Draft EIS did address the concept of alternative sites (i.e., an off-site alternative) in **Section 2.5 Alternatives Not Considered in Detail**. Specifically, **Section 2.5.4** (page 2-50 of the Draft EIS) indicated that alternative sites for the proposed action at Sand Point Magnuson Park were not evaluated in the EIS because the Department of Parks and Recreation was considering multiple sites for athletic field development throughout the City of Seattle under the Joint Athletic Fields Development Program. This level of consideration for an off-site alternative was and is fully consistent with SEPA requirements relative to alternatives.

The SEPA rules require the lead agency to describe and evaluate the proposed action and reasonable alternatives to that course of action (WAC 197-11-440(5). The rules indicate that reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation, and provide that the EIS may indicate the reasons for eliminating alternatives from detailed study.

The Final EIS adopts the same approach to alternative sites, as the Department of Parks and Recreation still considers this to be an alternative that is not appropriate for detailed consideration in the EIS. The City's objectives for the proposed action are identified in **Section 1.3** of the EIS. Those objectives were established in Resolution 29249, adopting the Sand Point Physical Development Management Plan; Resolution 30063, adopting the Sand Point Magnuson Park Concept Design; and Resolution 30293, amending the Concept Design. The documents adopted by those resolutions identify general objectives for expanding recreational opportunities, enhancing open space and natural areas, demonstrating environmental sensitivity and improving accessibility at Sand Point Magnuson park, and describe how those objectives are to be met. Resolution 30063 specifically identifies objectives for development of 11 lighted sports fields with synthetic turf and 4 fields with natural grass.

Section 2.5.4 has been expanded in the Final EIS to provide a more detailed discussion of the Department's reasoning on this issue. In summary, the Department does not believe that there are alternative comparable sites available that could accommodate and meet the objectives of the proposed action and do so at lower environmental cost. In addition, any sites that might otherwise be plausible

candidate locations for large-scale sports field development are already identified through the JAFDP as sites proposed for lighted sports fields, so there do not appear to be available sites that could substitute for Sand Point Magnuson Park and avoid the types of neighborhood impacts associated with the proposed action.

Issue SEPA 2: Definition of EIS alternatives

Issue: A number of comments disagreed with the definition of the alternatives evaluated in detail in the Draft EIS, primarily with respect to the lesser-capacity alternative. In general, these comments raised the issue that the lesser-capacity alternative did not meet the SEPA definition of an alternative that can be analyzed in the EIS. These commenters typically did not think that the lesser-capacity alternative was different enough from the proposed action in terms of its scope or ability to reduce environmental impacts.

Applicable Comments: O2-3, O7-7, I51-5, I85-1, I85-13, I149-1, I163-1, I266-5, I285-4, I333-8, T17-4, T32-3, T35-2, T42-3, T44-1, T51-1, T55-2

Response:

A purpose of an EIS is to evaluate the significant environmental impacts of the proposed action and other "reasonable alternatives" (WAC 197-11-400 (2)). The SEPA rules define a "reasonable alternative" as one that could feasibly attain or approximate the proposal's objectives but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440 (5)(b), 197-11-786). An EIS is not required to examine every possible alternative; the word "reasonable" is intended to limit both the number and range of alternatives as well as the amount of detailed analysis for each alternative WAC 197-11-440 (5)(b)(i)).

The lesser-capacity alternative analyzed in the Draft EIS represented a project plan that would reasonably approximate the objectives for the proposal (specifically, the objective to provide a large increase in sports field capacity at Sand Point Magnuson Park), but would result in lower environmental impacts for several elements of the environment. Based on the total number of fields and the number of fields with synthetic turf and lighting systems, the original lesser-capacity alternative was estimated to provide about three-quarters of the field capacity increase represented by the proposed action. Because 7 of these fields would be lighted, compared to 11 fields under the proposed action, this configuration of the lesser-capacity alternative would have resulted in reduced human disturbance impacts to the wetland/habitat complex and reduced lighting and noise impacts for nearby residents. The SEPA rules do not require that alternatives produce no impacts, that all impacts be lower, or that all conditions (e.g., habitat) be the same for all alternatives. Given that a purpose of an EIS is to disclose environmental effects and to permit a reasoned choice among alternative courses of action, the Draft EIS configuration of the lesser-capacity alternative would seem to facilitate this consideration.

In response to the Draft EIS review comments on this issue, however, the Department elected to revise the lesser-capacity alternative for the Final EIS. The plan for the lesser-capacity alternative that is evaluated in the Final EIS is described in **Section 2.3**. In summary, the primary changes to this alternative were to eliminate one of the baseball/softball fields located adjacent to the wetland/habitat complex, shift the locations of two soccer fields farther away from the wetland/habitat complex, and change the plans for four other fields from synthetic turf and lights to natural turf and no lights.

Consequently, the revised lesser-capacity alternative includes only three fields with synthetic surfaces and lighting systems. As documented in the impact analyses presented in the Final EIS, this configuration would considerably reduce the lighting and operational noise impacts for nearby residents, would considerably increase the buffer area between the sports fields and the wetland/habitat complex, and would eliminate the generation of spill light from the sports fields within the wetland/habitat complex. The Department estimates that this configuration for the lesser-capacity alternative would provide about half as much increased sports field capacity as the proposed action. The Seattle City Council will need to evaluate whether this reduction in field capacity reasonably approximates the objectives for the proposal, and whether it is sufficiently consistent with the objectives for Sand Point Magnuson Park that are identified in the Reuse Plan, the Sand Point Physical Development Plan and the Magnuson Park Concept Design.

Issue SEPA 3: Alternatives not evaluated in the Draft EIS

Issue: Numerous comments directly or indirectly raised the issue of addressing additional alternatives in the Draft EIS. Some commenters wanted detailed consideration of alternatives with only natural-turf sports fields instead of primarily fields with artificial turf, with no or significantly reduced lighting, and with more natural or undeveloped open space, among other things. Other comments argued that in the process of creating the proposed action and alternatives, changes should have been made to the proposal along the way to further reduce potential impacts to the built and natural environment.

Applicable Comments: O2-1, O2-4, O8-5, O10-3, O12-6, O13-3, O14-2, O14-3, O15-32, O16-4, I5-3, I12-4, I37-7, I51-1, I56-1, I79-6, I85-14, I89-3, I99-1, I149-5, I155-6, I173-3, I177-1, I188-1, I193-5, I209-13, I209-19, I259-3, I266-5, I266-10, I268-11, I292-13, I299-6, I307-2, I334-9, I342-5, I367-5, T11-5, T13-1, T15-4, T23-1, T41-3, T41-4, T42-3, T45-1, T46-1, T47-2, T49-2

Response:

As indicated in the previous response, a purpose of an EIS is to evaluate the significant environmental impacts of the proposed action and other "reasonable alternatives" (WAC 197-11-400 (2)). An EIS is not required to examine every possible alternative; the word "reasonable" is intended to limit both the number and range of alternatives as well as the amount of detailed analysis for each alternative WAC 197-11-440 (5)(b)(i)).

The Draft and Final EIS both evaluate two alternatives to the proposed action: a lesser-capacity alternative with a similar number of sports fields and a similar acreage of wetland/habitat complex; and no action. Pursuant to the SEPA rules, this is believed to be a reasonable number and range of alternatives to permit comparative evaluation to the proposal. These alternatives are consistent with the Department's objectives of providing a large increase in sports field capacity and habitat value and diversity, in response to direction established through many years of planning for Sand Point Magnuson Park. They also allow decision makers to consider the effects and trade-offs associated with a different sports field configuration, and with a non-development plan for the project site. As discussed in the response to issue SEPA 2, the lesser-capacity alternative (particularly the configuration evaluated in the Final EIS) would result in considerably lower environmental impacts for several elements of the environment, and would therefore comply with the requirements for a reasonable alternative.

The Draft EIS also described a number of other possible alternatives that were considered but not evaluated in detail (see **Section 2.5**, pages 2-49 and 2-50). These included suggestions offered during the scoping process for the EIS and the previous years of planning for Sand Point Magnuson Park, which generally addressed (1) expanded (or decreased) sports field capacity; (2) expanded (or decreased wetland/habitat area; or (3) sports field configurations with no synthetic surfaces or lighting systems. Consistent with the SEPA rules, the Draft EIS described the reasons these suggestions were not evaluated in detail. Those reasons generally involved inconsistency with the objectives identified by the City Council and the Department with respect to desired sports field capacity, inconsistency with established planning direction for Sand Point Magnuson Park, and inconsistency with the City Council's determination that lights and synthetic surfaces are needed to provide sufficient sports field capacity and year-round play. The Final EIS maintains the same position with respect to detailed evaluation of other action alternatives. Please refer to **Section 2.5** for further information.

Some comments in this issue category were rather general statements of opinion that the alternatives evaluated are flawed or not acceptable. Comments of this nature do not comply with the direction in the SEPA rules that comments shall be as specific as possible (WAC 197-11-550), and do not provide a basis for a substantive response.

With respect to the level of treatment provided for each alternative, the Department believes that both the Draft and Final EIS are consistent with required practice. The SEPA rules require that an EIS "devote sufficiently detailed analysis to each reasonable alternative to permit a comparative evaluation of the alternatives including the proposed action. The amount of space devoted to each alternative may vary (WAC 197-11-440 (5)(c)(v)). The Draft and Final EIS both provide a sufficient amount and detail of information to permit a comparative evaluation among alternatives. The description of the lesser-capacity alternative presented in **Section 2.3** focused on the *differences* between that alternative and the proposed action; no point would be served in repeating the characteristics of each alternative that are similar or the same. Likewise, the impact results for the lesser-capacity and no action alternatives were generally derived and described in comparison to the impacts already identified for the proposed action, allowing a more condensed discussion for the impacts of the alternatives. The rules do not require that the alternatives be evaluated at precisely the same level of detail or be allocated the same volume of discussion.

Issue SEPA 4: Adequacy of the Draft EIS

Issue: Numerous comments stated that the Draft EIS should be considered inadequate. Many of these comments claimed the document justified rather than analyzed the significant impacts associated with the proposed action and alternatives. Other comments stated that impacts associated with the project were not thoroughly analyzed, if mentioned at all. Many comments stated that a Supplemental Draft EIS should be prepared to correct the inadequacies of the Draft EIS.

Applicable Comments: A6-1, O2-19, O13-2, O14-11, I41-1, I44-1, I80-3, I155-1, I188-3, I209-1, I209-10, I254-7, I285-1, T25-5, T25-6, T31-1, T32-1, T41-1, T41-2, T51-2, T55-4

Response:

A number of the comments in this issue category are general statements or assertions that the EIS level of detail is insufficient, that various types of impacts were ignored, or that the analysis of some impacts is

vague or inadequate. Others were clearly based on disagreement with certain impact conclusions presented in the Draft EIS, although specific support for the disagreement was not provided in the comment. Many of the comments in this group were introductory or concluding statements that may or may not have been supported by specific information presented in other comments contained in the same comment record. Comments of this nature do not comply with the direction in the SEPA rules that comments shall be as specific as possible (WAC 197-11-550), and do not provide a basis for a substantive response.

A common theme among several of the comments in this category was that the Draft EIS ignored or did not provide sufficient weight to impacts of the proposal on the neighborhoods surrounding Sand Point Magnuson Park. The Draft EIS clearly provided a large amount of information on the impacts of the project, and addressed all of the issues identified in scoping. The Department believes that the Draft EIS (and the Final EIS) thoroughly and fairly addressed all impacts wherever they would occur, including within the surrounding neighborhoods, and did not limit the investigation to just the Sand Point Magnuson Park site.

The SEPA rules provide that a supplemental EIS shall be prepared as an addition to either a draft or final EIS if (a) there are substantial changes to a proposal, so that the proposal is likely to have significant adverse impacts; or (b) there is significant new information indicating, or on, a proposal's significant adverse environmental impacts (WAC 197-11-405). Some of the impact analyses presented in the Draft EIS, particularly for noise, light and glare and transportation, have been modified for the Final EIS to include additional information and/or to clarify information contained in the Draft EIS. While this information should add to reader understanding of the impacts and the tradeoffs associated with the proposal, it does not identify significant new impacts that were not already disclosed in the Draft EIS and it does not lead to substantially different conclusions about the level of the impacts previously identified. Therefore, the conditions under which a supplemental EIS is appropriate do not apply, and there is no need for the Department to issue a supplemental Draft EIS before completing the SEPA process for this proposal.

Issue SEPA 5: Sufficiency of EIS scope with respect to other Sand Point Magnuson Park projects

Issue: A number of comments criticized the scope of the actions evaluated in the Draft EIS as being too narrow, maintaining that it should have included other projects proposed for Sand Point Magnuson Park in addition to the drainage, wetland/habitat and sports field/courts project. Some of these comments specifically charged the Department of Parks and Recreation with "piece-mealing," or segmentation, i.e., treating all of the different projects planned for Sand Point Magnuson Park as separate actions to avoid comprehensive analysis of environmental impacts for the entire site. Several comments noted that this type of approach to environmental review is not allowed under SEPA, that if multiple projects planned for an area are related or all part of one proposal, they cannot be broken down into smaller projects to avoid an analysis of cumulative impacts associated with the proposals.

Applicable Comments: O6-2, O7-6, O14-1, O15-2, O15-11, O15-20, O17-5, I12-1, I68-5, I85-5, I209-7, I209-12, I220-1, I221-6, I232-1, I266-7, I268-8, I268-10, I285-8, T5-5, T8-4, T15-2, T17-1, T44-6, T55-5

Response:

The SEPA rules provide direction for determining when proposals may be considered independently or in conjunction with other proposals. The rule states:

> "Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document… Proposals or parts of proposals are closely related, and shall be discussed in the same environmental document, if they: (i) cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or (ii) are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation (WAC 197-11-060 (3)(b)).

"Similar actions" may be, but are not required to be, evaluated in the same environmental document (WAC 197-11-(3)(c)(i)). The rule repeats three times that this provision is optional.

The primary purpose behind the SEPA rules regarding segmentation is to avoid dividing proposals into smaller parts that may either escape environmental review entirely or make it difficult or impossible to evaluate cumulative impacts. Neither of these conditions applies to the Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project and the other pending actions at Sand Point Magnuson Park. An EIS has been prepared for this project, and separate SEPA reviews have been conducted for other on-site projects that are sufficiently far along in the planning process, such as the Off-Leash Area, the North Shore Recreation Area and the Community Garden. The current EIS identifies the status of the other planned actions pending on the Sand Point Magnuson Park site (see **Section 2.6** of the Draft and Final EIS) and considers the potential combined effects of multiple projects in the evaluation of cumulative impacts presented for each element of the environment.

While the Department had the option of combining the environmental review for the current project and other proposed actions for the site, it did not elect to follow this approach. The primary reason for this decision is because the various actions proposed for different areas of the Sand Point Magnuson Park site are independent proposals that are being defined through separate planning processes on separate schedules, and that are appropriately reviewed through separate SEPA processes. The improvements under consideration for the North Shore Recreation Area, Community Garden, Off-Leash Area, Promontory Point, Community Campus, Tennis Center and Magnuson Boat Launch would all be supported by project-specific funding sources that are unrelated to and independent of the funding for the Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project. The Tennis Center, for example, could be funded and developed regardless of whether the proposed sports fields and courts are developed, and vice versa. None of the various actions contemplated for the Sand Point Magnuson Park site must be implemented simultaneously with one or more of the other actions. While all of the subject actions were included to some degree in the scope of the Reuse Plan EIS, none are interdependent parts of a larger proposal that require the larger proposal as justification for their implementation. Therefore, these actions constitute similar actions but not interdependent actions, and it is not necessary to cover fully all of these actions within the same environmental document. The intent of the SEPA regulations is met as long as all of the actions are subject to environmental review and the potential for cumulative impacts is appropriately disclosed; the Department has met this intent for the Sand Point Magnuson Park actions.

Issue SEPA 6: EIS scope with respect to economic impacts

Issue: Some comments raised the issue of the economic impact that the proposed project, specifically the lighted sports field component, could have on property values in the surrounding neighborhoods. Most of these comments stated that an analysis of these effects should be included in the Draft EIS. Comments stated that existing on-site views contributed significantly to the value of the properties and that these views would be degraded with installation of the lighted fields, thereby diminishing surrounding property values. Other comments suggested that an evaluation of the financial impact of sports injuries and associated lawsuits due to the use of artificial turf on the playing fields should also be included in the Draft EIS.

Applicable Comments: O10-2, O10-6, I12-4, I67-6, I72-5, I146-5, I266-9, I284-1, I292-7, I337-3, I354-4, I357-4, I358-3, T2-4, T37-1, T52-2

Response:

The SEPA rules (WAC 197-11-448) do not require agencies to address concerns such as property values and taxes in an EIS, because the statute and the rules envision general welfare, social, economic and other considerations as factors decision makers would evaluate *apart from* the environmental impacts addressed in an EIS. Property values, taxes and prospective legal costs clearly fall within the realm of "social policy analysis (such as fiscal and welfare policies…," which is specifically identified in WAC 197-11-448 (3) as an example of information not required to be discussed in an EIS. Moreover, appellate court decisions have consistently affirmed that economic considerations, including impacts on property values, are beyond the zone of interest encompassed by SEPA. While it would be proper for the Seattle City Council to consider issues such as economic impacts to property values in their deliberations over project approval, but it is not necessary or required to do so in the project EIS. This issue is properly considered beyond the scope of the subject EIS, and the Final EIS has not been modified to include an assessment of potential economic and financial effects.

Issue SEPA 7: EIS scope with respect to quality of life impacts

Issue: A few comments raised the issue that the quality of life for on-site as well as off-site residents would be adversely affected by the project, and stated this subject should be analyzed in the Draft EIS.

Applicable Comments: O13-1, I67-5, I72-4, I79-1, I89-1, I188-4, I292-6, I292-7, I354-4

Response:

The elements of the environment under SEPA are identified at WAC 197-11-444; this listing includes no mention of "quality of life" or any equivalent term. As noted previously in the response to issue SEPA 6, WAC 197-11-448 specifically identifies economic and financial considerations and social policy analysis as factors that need not be addressed in EISs. Based on the specific exclusion of social policy analysis in 448 (3), Draft EIS comments that relate to potential or perceived quality of life impacts are appropriately classified as issues beyond the required coverage of SEPA. These factors may be considered by decision makers *along with* information on environmental impacts, but they do not involve *environmental* impacts and do not need to be included in the EIS. It should also be noted that several of the comments in this

issue group reflect the belief that more tangible effects associated with light and glare, noise and/or traffic would be sources of diminished quality of life, and that these impact issues are addressed in detail in the Draft and Final EIS.

Issue SEPA 8: Sufficiency of mitigation measures

Issue: Several comments asserted that the Draft EIS did not propose or identify mitigation sufficient to address the impacts associated with the project. Two comments in this group claimed there was not adequate mitigation for a group of multiple impact types, specifically "traffic, noise and people." One comment requested a sufficient buffer zone as mitigation for noise, traffic, parking and visual blight. One comment made the blanket statement that the DEIS did not address mitigation issues, followed by specific reference to plantings to block noise and glare and scaling down the lighting standards for the sports fields. One comment expressed the general need for additional mitigation measures under each element in the document.

Applicable Comments: O13-3, I209-16, I221-7, I268-9, T11-5

Response:

"Mitigation" is defined in SEPA to mean:

(1) *avoiding* an impact altogether by not taking an action or parts of an action;
(2) *minimizing* impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
(3) *rectifying* the impact by repairing, rehabilitating or restoring the effected environment;
(4) *reducing* or eliminating the impact over time by preservation and maintenance operations during the life of the action;
(5) *compensating* for the impact by replacing, enhancing or providing substitute resources or environments; *and/or*
(6) *monitoring* the impact and taking appropriate corrective measures (WAC 197-11-768, emphasis added).

SEPA does not prioritize the listed approaches to mitigation or require that they be applied in any specific sequence. It is the responsibility of the decision maker to determine reasonable and appropriate mitigation in a given situation, pursuant to guidance contained in the rules (WAC 197-11-660). The Draft EIS identified mitigation measures that are incorporated in the proposal (i.e., already committed to by the applicant) and/or additional measures that are recommended for further consideration for every instance in which significant environmental impacts were identified. Consistent with the SEPA rules (WAC 197-11-440 (6)(c)(iii), these two categories of mitigation are distinguished in the text of each section of the Draft EIS. The approach followed in the Draft EIS, which is commonly accepted SEPA practice, is to identify a full range of measures that may be considered by the decision maker to mitigate the impacts of the proposal. As part of its review of the proposed action, and pursuant to its substantive authority under SEPA, the Seattle City Council will determine and specify which mitigation measures to require as conditions of approval of the project(WAC 197-11-660).

The Draft (and Final) EIS identified significant impacts relating to noise and light and glare. Proposed and/or potential mitigation measures related to each type of impact were identified in the document, and

the discussion of mitigation for these impacts has been refined in the Final EIS. The transportation analysis did not result in the identification of significant traffic or parking impacts, so no mitigation measures for these topics are identified. While the relationship to existing land use plans and to estimated population is an element of the environment identified in the SEPA rules (WAC 197-11-444), an increase in "people" itself does not constitute an adverse environmental impact under SEPA. To the extent that more people on the project site would result in more traffic and noise, those dimensions of the increase in people are already addressed in the EIS.

Issue SEPA 9: Necessary permits for the proposed action

Issue: One comment questioned whether the project would require a permit under Section 404 of the Clean Water Act.

Applicable Comments: O15-8

Response:

Agencies with jurisdiction over the proposed project and permits that may be required are described in the Fact Sheet located at the front of the EIS. As discussed in **Section 3.3.5**, the regulatory requirements for wetland compensation on the proposed project are unknown until project-specific permit applications and subsequent discussions with resource and regulatory agencies take place. However, it is assumed that an individual permit under Section 404 of the Clean Water Act, as administered by the US Army Corps of Engineers, would be required. It is also assumed that a Shoreline Permit from the City of Seattle, an Hydraulic Permit Application from the Washington Department of Fish and Wildlife, and a City of Seattle Environmentally Sensitive Areas review and grading permit would all be required. The purpose of the EIS is to identify probable adverse impacts from the proposed projects; the purpose of the permit applications is to assure that each regulatory agency has sufficiently detailed information from which to determine if the proposed project meets the framework of their legal requirements. Most of the city, state and federal permit processes incorporate an element of public notice to seek public input and comment prior to denying or approving with conditions a specific permit application.

Issue SEPA 10: Implementation of a City light restriction ordinance

Issue: A few comments assert that, with the development of lighted fields at Sand Point Magnuson Park, the City would be contributing to light pollution in the surrounding areas and the city as a whole, and/or to increased electricity use. All of these comments suggested implementing a light restriction ordinance, as have other cities or government entities across the country, while two (nearly identical) comments identified specific communities with more restrictive lighting ordinances.

Applicable Comments: O2-17, I121-4, I188-4, I209-18

Response:

It is unclear from the full text of these comments specifically what steps the reviewers believe the City of Seattle should take with respect to lighting. Two of the comments in this group appear to be oriented toward light pollution and to ordinances regulating light fixtures, lighting levels and light trespass. The

Department of Parks and Recreation already has adopted a standard regulating spill light from City park facilities that might occur as light trespass on adjacent residential properties to 0.8 foot-candles at the property line; this standard is discussed in detail in **Section 3.9**. The City also conducted a ballfield lighting study to provide specific guidance on sports field lighting, and has adopted both a use and scheduling policy and lighting design guidelines to help minimize the impacts of sports field use on neighboring residents.

The other two comments in this group appear to be oriented toward electricity consumption and energy conservation. The City has already adopted a variety of policies and programs to encourage energy conservation on a general basis. The plans for the proposed action also include design and operational measures to minimize the consumption of electricity, given that a number of sports fields would be used after daylight hours to meet the objectives for the proposed action. In this instance, there is a tradeoff between the City's desire to promote energy conservation and the desire to accommodate growing demand for sports field capacity.

With respect to either facet of this issue, the Department believes that application of the existing City policies and programs is sufficient for design and mitigation of the proposed action. Any further consideration of the need for additional ordinances relating to light trespass or energy consumption would be unrelated to and beyond the scope of this EIS.

Issue SEPA 11: Allocation of City funds

Issue: Several comments questioned the cost of the proposed action or the appropriateness of expending a large amount of City funding on the elements included in the proposed action. For example, one comment asserted the City is proposing to use $12 million of taxpayer money to fund development of the park when there are many other issues in the city (e.g., transportation/transit issues) that need to be addressed and should have higher priority. Several comments noted difficulties in maintaining City parks at suitable levels and recent proposals to close King County parks, and wondered how the City would be able to afford maintenance of the proposed project.

Applicable Comments: O2-14, I44-9, I146-1, I166-4, I176-1, I215-5, I259-4, I292-12, I307-5, I333-5, I333-12, I333-17, T18-3, T45-7

Response:

Issues relating to how the City chooses to spend City funds and whether the City could afford to maintain the proposed facilities fall within the realm of "general welfare, social, economic and other requirements" that SEPA contemplates would be taken into account in making final decisions on proposals, but that need not be evaluated in an EIS. This issue is beyond the scope of the EIS and, consistent with the SEPA rules, is not addressed in the content of the Draft or the Final EIS.

Issue SEPA 12: Consistency of proposed uses with terms of Navy transfer and EIS

Issue: Three comments raised issues related to the transfer of the Sand Point property from the Navy to the City, and the environmental documentation associated with that transfer. One comment stated that the uses identified in the proposed action are not consistent with the terms of the property transfer or the uses analyzed in the federal EIS for the transfer, and that the Navy must therefore

re-analyze the transfer. Another comment maintained that the previous EIS dismissed consideration of lights on the basis that no bright lights would be installed at Magnuson Park.

Applicable Comments: I51-9, I285-9, T32-4

Response:

These comments are lacking somewhat in the specificity needed to provide thorough and completely accurate response. The first comment did not identify in what respects the proposed uses were considered to be inconsistent with the terms of the property transfer. As described in **Section 2.1** of the EIS, however, the federal government requested the City take the lead in developing a plan for reuse of the property; that request resulted in the City's Reuse Plan EIS, the Sand Point Physical Development Management Plan and the Magnuson Park Concept Design, all of which are consistent with and reflected by the components of the proposed action. The Department is not aware of any inconsistency between the terms of the property transfer, which was executed after the Reuse Plan was finalized, and the proposed action.

The second comment appears to be incorrect concerning coverage of lighting in the "previous EIS for the transfer of the Naval Station to the City," assuming this reference is to the City's 1996 Reuse Plan EIS. That document does not state that "there would be no bright lights installed at Magnuson Park." To the contrary, the 1996 EIS indicates that lights would remain or be installed on and outside of buildings according to the safety and security needs of future occupants, that street lights would meet City standards, and that exterior lighting would be shielded or directed to reduce spillover to adjacent properties.

Issue SEPA 13: Lead agency/NEPA jurisdiction over the environmental review process

Issue: One comment questioned why the EIS was not a NEPA (National Environmental Policy Act) document with the US Army Corps of Engineers (a federal agency) as the lead agency. The comment maintained that the Corps would need to issue a wetland permit because of the scope of the anticipated wetland impacts, that the permit would constitute a major federal action and that a NEPA EIS would be required. Consequently, the environmental document should be a NEPA/SEPA EIS with the Corps as the lead federal agency.

Applicable Comments: A6-2, I85-2

Response:

The proposed action that is ready for environmental review at this time is the City's proposal to implement the proposed project, pursuant to the planning direction established by several previous City decisions. Therefore, the City (represented by the Department of Parks and Recreation) is the project proponent, SEPA is the only environmental review statute for which compliance is needed at this time, and the Department is the appropriate lead agency. The City has not yet prepared or filed an application to the Corps for a Section 404 permit under the federal Clean Water Act, because the City does not yet have the detailed planning information needed to support such an application, so there is no federal action pending at this time for which NEPA compliance would be needed. The Corps would need to document compliance with NEPA if and when the City does file a Section 404 permit application. The Draft EIS

review input from the Corps concurred with this approach, as the agency indicated it would "review the project at the 404 stage" (Comment A6-2).

Issue SEPA 14: Sufficiency of agency coordination and participation

Issue: One comment maintained that insufficient agency coordination and participation, as required under SEPA, had been conducted in support of this project.

Applicable Comments: I85-8

Response:

The comment correctly notes that SEPA requires the responsible official to consult with and obtain the comments of any public agency that has jurisdiction by law or special expertise with respect to any environmental impact involved. This guidance from the SEPA statute is carried through the provisions of the SEPA rules addressing scoping (WAC 197-11-360 and 408) and issuance of DEIS (WAC 197-11-455). The Department of Parks and Recreation complied fully with these SEPA requirements in conducting the SEPA process for this proposed action.

The Department circulated the Determination of Significance/scoping notice for the proposed action in August 2001 in full compliance with the respective notification requirements. The DS/scoping notice was sent to 13 federal agencies, 3 tribal entities and 12 state agencies, including all of the resource agencies referenced in the comment. None of these agencies submitted written comments on the scope of the EIS during the required scoping period, provided verbal comments at either of the two public scoping meetings held in September 2001, or indicated an interest in participating in the SEPA review as an agency with jurisdiction or expertise.

Similarly, the Department distributed the Draft EIS to the rather long list of federal, tribal, state and local government entities identified in Chapter 6 of the Draft EIS, again including all of the resource agencies referenced in the comment. In response, the Department received brief comments from the US Army Corps of Engineers and the Washington Department of Ecology among the referenced agencies. The Corps response (comment record A6) indicated that the Draft EIS was a very good draft document and that the agency would review the project at the Section 404 permit stage. The Ecology response (comment record A8) included one comment addressing the need to check for possible soil contamination on the site of the former Navy Commissary.

In summary, the SEPA provisions regarding agency coordination require the lead agency to provide other agencies with the *opportunity* to provide comments and to participate in the process, but they do not require the lead agency to *ensure* or *enforce* the participation of resource agencies. The Department made every reasonable effort to provide those opportunities at the appropriate points in the process, and cannot be held responsible for lack of action by other parties.

Despite the limited formal participation by resource agencies in the scoping and Draft EIS review processes, there was informal involvement of resource agency staff at the technical level that is documented in the EIS. **Sections 3.3 and 3.4 (Plants/Wetlands and Animals and Fish)** of the Draft EIS specifically referenced consultation with resource staff from the Washington Department of Natural

Resources and the U.S. Fish and Wildlife Service, as well as fisheries experts from Seattle Public Utilities.

Issue SEPA 15: Sufficiency of public notice and opportunity for input

Issue: Several comments raised issues relating to the adequacy of public notice concerning project meetings and other opportunities for public input on the EIS, or to the openness of officials in considering public input. One comment claimed the Draft EIS documented a failure to get public input, as evidenced by the low turnout at the two public scoping meetings. Another comment stated that the writers' experience at neighborhood meetings conducted by city and school officials had convinced them that input from neighborhood residents is dismissed and that decisions had already been made. A third comment specifically criticized the Department for its response to a request for disclosure of certain Sand Point Magnuson Park records and for refusing to grant an extension of the EIS comment period. Other comments pertained to a stated inability to obtain copies of the EIS for review.

Applicable Comments: I85-9, I282-2, I285-2, T23-5

Response:

The Department of Parks and Recreation has made extensive efforts to make the SEPA process for this EIS open, accessible, informative and responsive. **Chapter 5** of the Final EIS (Chapter 4 in the Draft EIS provides a summary of the opportunities for public comment on the EIS and the results of those opportunities. That material demonstrates that Comment I85-9 is in error in several respects. The comment maintains that the notice of the scoping meetings must have been terribly ineffective, in view of the low turnout. The process for providing public input in determining the scope of the EIS was in fact well advertised; the DS/scoping notice was distributed to approximately 60 agencies at all levels of government, more than 30 community organizations, 8 libraries and 5 newspapers. **Section 4.1.1** of the Draft EIS stated that the Department advertised the meetings in local newspapers (as is required under SEPA), in the Sand Point Magnuson Park newsletter, and by *direct mail invitation to 15,000 households* in the general vicinity of the park. Comment I85-9 also claims that there was no mention of how many comments were received by mail, but **Section 4.1.1** of the Draft EIS also indicated that 14 letters were received in response to the scoping notice. The same comment criticizes the attendance at public meetings on October 8, 2001 (the first lighting demonstration) and October 22, 2001 (a community issues meeting), yet fails to note that these were *additional* opportunities for public input beyond those provided during the formal scoping period, or that the Department arranged a second lighting demonstration.

Comment I282-2, which refers to unspecified meetings with "city and school officials" and the general dismissal of input from neighborhood residents, appears to reflect a personal belief about local decision processes in general. The comment is not specific to the Department of Parks and Recreation or to this EIS process, and does not provide the basis for a direct response.

Comment I285-2 refers to a request for disclosure of records concerning past public complaints about noise and light from Sand Point Magnuson Park, and cites the timing of the response to that request as grounds for an extension of the Draft EIS comment period. The Department provided a letter response to the request explaining why it was not necessary or appropriate to extend the EIS comment period (because the comment period was already set at 56 days, when the SEPA rules provide for an optional 15-

day extension of the standard 30-day review period, or 45 days total). The records at issue are discussed in other comments in record I285, and are addressed in the Final EIS. With respect to future opportunities for input on the proposal, it must be noted that issuance of a Final EIS does not constitute a decision on a proposal. Agencies may take no action to implement a proposal for at least 7 days after release of a Final EIS, which effectively provides another chance for interested parties to submit comments on a proposal before implementation. The Seattle City Council will make the final decision on the current proposal through an open, public process that will provide additional opportunity for citizen input.

A few comments offered at the Draft EIS public hearing noted difficulty in obtaining copies of the Draft EIS for review. The notice of availability for the Draft EIS was widely publicized in accordance with SEPA regulations, including publication in local newspapers, and explained where copies of the Draft EIS would be available for viewing. Copies of the Draft EIS were distributed to over 40 community organizations and 8 libraries, including the Seattle Public Library branches closest to the project site. The notice of availability also indicated that copies of the Draft EIS could be reviewed at the Sand Point Magnuson Park offices at 7400 Sand Point Way NE.

Issue SEPA 16: Documentation of baseline environmental conditions

Issue: Some comments argued that the EIS failed to sufficiently establish baseline environmental conditions upon which to base impact analysis. Three comments regarding the documentation of baseline conditions focused on mapping of the existing and proposed conditions of the entire park and the project site.

Applicable Comments: I85-10, I85-12, I85-16

Response:

Documentation of baseline conditions is not limited to mapping of the affected area; the Draft EIS provided extensive text, tabular and graphical documentation of baseline conditions for an appropriate geographic area, including distinctions among the project site, the remainder of the park and the surrounding area. The maps of existing and proposed conditions presented in the Draft EIS (e.g., Figure 2.1-2 and Figure 2.2-1, respectively) are quite complex as is; including shadow outlines of existing features on maps for the alternatives would be confusing and not highly legible. Figures 1.1-2 and 2.1-1 clearly showed the boundary for the entire park, as well as key landmarks and built environment features. Graphics such as Figures 2.1-2 and 2.2-1 include sufficient physical and constructed features that the reader should be able to register these project-site maps to the remainder of the park.

Comment I85-12 offers several criticisms of Figure 2.1-2. This figure presents existing conditions for the 153-acre project site, and is not intended or does not need to show conditions for the entire park. Locations of historic district features are well documented in **Section 3.11**. The list in question on page 2-4 of the Draft EIS is for features within the entire park, so it is to be expected that not all of these features would be present on Figure 2.1-2. Comment I85-12 is incorrect with respect to the boat launch, as both the lines for this feature and a corresponding label are clearly present in the lower right-hand corner of Figure 2.1-2.

Issue SEPA 17: Approval process and timing for related park plans

Issue: One comment letter argued that approving the Joint Athletic Fields Development Program (JAFDP) before impact analysis is complete on the Sand Point Magnuson Park project is contrary to SEPA. The comment letter stated further that fast-tracking of an incomplete JAFDP prior to implementing provisions needed to protect nearby neighborhoods from irreversible environmental impacts (e.g., glaring lights until 11 PM, noise, traffic congestion), is wrong. Similar concerns were raised in several testimony comments. One comment also argued that the Vegetation Management Plan (VMP) that is referred to in the Draft EIS was not available for review during the EIS comment period along with the EIS.

Applicable Comments: I328-1, I328-3, T13-6, T16-3, T39-2, T45-8

Response:

In general, concerns about the decision process for the Joint Athletic Fields Development Program are beyond the scope of the Drainage, Wetland/Habitat Complex and Sports Fields/Courts Project EIS and cannot be resolved through this EIS process. The JAFDP is a joint program between the City of Seattle and the Seattle School District. When the 2002 update to the JAFDP is completed it will presumably be adopted by the Seattle City Council, which will also make the final decision on the proposed project. While the proposed action for Sand Point Magnuson Park is identified in the draft JAFDP update as a priority action, final approval of the project does not depend on final approval of the JAFDP and vice versa. The JAFDP identifies several sports field projects that are currently underway or are active proposals for which funding sources have been identified. Neighborhood concerns over sports field development and operation have received extensive consideration in the deliberations to date on the JAFDP update, and it is evident that adoption of the JAFDP would occur only with concurrent adoption of policies responsive to those concerns. For example, on April 25, 2002 the Board of Park Commissioners recommended approval of a sports participation policy, a field use and scheduling policy and a set of lighting design guidelines, all of which include measures that are specifically responsive to neighbors' concerns over sports fields.

The Vegetation Management Plan (VMP) for Sand Point Magnuson Park was adopted in December 2001, prior to release of the Draft EIS for the subject project. The VMP was developed through a public process with many opportunities for citizen and community organization input, and the development and adoption of the plan were well publicized. Copies of the plan were distributed and were also available for review at the Sand Point Magnuson Park offices before, during and after the Draft EIS review period.

4.1.2 Project Description (PD)

Issue PD 1: Sufficiency of information on construction phasing

Issue: Several comments raised the issue of project phasing, stating that the EIS does not clearly identify when one phase ends and another starts, the milestones for success of each phase, the budget for each phase, the timing of wetland construction, etc. Other comments focused on the level of funding that would be available for each phase and what the City would do in the case that funding was not available for a particular phase.

Applicable Comments: O15-10, O15-19, I37-6, I172-1, I205-2, I209-17, I308-1, T8-2

Response:

The intent of the project phasing plan (described in **Section 2.2.12**) is to develop the most efficient sequence of construction for the project, given existing budget realities and projecting possible future budgets consisting of both public and private dollars. It is intended that Phases 1 and 2 would be constructed with funds already budgeted to Sand Point Magnuson Park. Phases 1 and 2 have been defined to reflect the highest priorities associated with the project, to assure those concerns are met with the existing funds. Based on these priorities and cost estimate information produced since the issuance of the Draft EIS, the phasing plan described in the Final EIS has been revised.

Implementation of subsequent phases would be determined by funding not yet budgeted, and as such, it is more difficult to predict the exact extent or timing of these subsequent phases. For this reason, the phases are designed so that they could be implemented independent of one and other, or, if possible, constructed at the same time or with overlapping schedules if funding allowed. In general, the proposed phasing plan is intended to provide a logical sequence for large scale construction activities on the site, while allowing the flexibility to add or remove smaller park elements as determined by funding status. Wetland/habitat complex and sports field development is to be balanced within these phasing plans to adequately account for funding designated for those respective areas, with some wetland/habitat and fields work being completed in all phases. Because the drainage design for the entire site is integral to the project, flowing from west to east, and the project would not be completed in one west-to-east phase, interim erosion, sediment control, and drainage elements would have to be implemented to allow the construction to be completed in phases.

Issue PD 2: Suitability of proposed fill soil

Issue: Some comments questioned whether the type of fill soil that is proposed for use as subgrade material for landscaping and sports fields is consistent with published standards. Other comments wanted to know if the City had an alternative plan in case the on-site soil material was determined to be unsuitable for use as subgrade material.

Applicable Comments: A4-1, O15-9, O15-21

Response:

One comment questioned whether the soil to be used for the natural-turf athletic fields would employ a sand/organic material ratio consistent with the recommendations of Washington State University agronomists. The proposed soil mix for the natural turf sport fields (see **Section 2.2.2**) contains 85 to 90 percent clean sand and 10 to 15 percent organic material. There are no official standards for natural-turf athletic field construction, although there are published guidelines and recommendations. These include the publication PNW 0240, "Construction and Maintenance of Natural Grass Athletic Fields." The U>S> Golf Association specifications for golf green construction have also been applied to sports fields in some instances. The materials proposed for the field base and root zone are consistent with the above guidelines.

The hydrogeologic report for the Magnuson Park Wetlands, dated September 22, 2000, indicates that AMEC Environmental, Inc. (previously AGRA) did not encounter peat in soil borings until reaching a depth that is below the depth of the proposed soil excavations. The log for soil boring B-4 indicates peat was encountered at a depth of roughly 5 feet. However, no site grading is proposed in this area. In addition, the log for soil boring B-5, where the deepest earthwork excavations are proposed, has no record of encountering peat. Most of the proposed earthwork excavations for this project are less than 5 feet deep. Most of the peat soils documented in the hydrogeologic report begin at a depth of roughly 9to 10 feet. The Beach Drive Pond and Lagoon excavations would reach a depth of 10 feet. However, these ponds are located near soil boring B-5, where no peat was encountered as noted above.

As a result of the soil boring information provided in the hydrogeologic report, it appears the majority of the soil to be excavated would be acceptable as fill material for the sports fields. Based on the proposed grading plans and the known locations of peat on the site, the likelihood of encountering peat during project excavation is considered low. Should soils unacceptable for sports field subgrade be encountered, they would be used as fill in areas with less stringent compaction and settlement requirements or would be removed from the site. It is not anticipated that excessive amounts of unacceptable subgrade materials would be encountered during construction of this project.

Issue PD 3: Size, shape and function of the proposed marshy ponds

Issue: Some comments on the Draft EIS questioned the location, shape and size of the marshy ponds proposed for the western part of the wetland habitat complex. These comments objected to the regular, rectangular shape of these ponds and wondered whether they could function as proposed with more natural shapes.

Applicable Comments: A7-10, O15-13

Response:

The ponds in question are "marshy pools" (see **Section 2.2.5**) intended to provide emergent marsh and mudflat habitat. The pools would not serve as stormwater ponds. The shape of the pools reflects an aesthetic function. The patterns and grading of the western portion of the marsh ponds are designed to evoke the geometry of the site's prior role as a Naval Air Station. The westernmost ponds are located within a grid that parallels the original airstrip alignment, evolving to more organic forms as the ponds near the center of the wetland/habitat complex. This aesthetic is a reflection of one of the "design principles" that guided the project, to create a diverse wetland/habitat complex while acknowledging the site's urban setting and history.

Issue PD 4: Level of detail on landscaping, irrigation and planting plans

Issue: Numerous comments stated a desire for additional information concerning the landscaping and irrigation system plans, planting plans for overall site landscaping and the wetland areas, and the types of vegetation that would be used for upland and wetland habitat plantings on the site. One comment stated there was a need for large trees to provide perches for raptors.

Applicable Comments: A4-2, A4-3, A7-8, O1-3, O7-3, O15-3, O15-6, O15-13, O15-18, I85-18, I172-2, I205-1, I268-1, I268-4, T8-3, T44-5

Response:

The level of detail on landscaping, irrigation and planting plans provided in the EIS is customary and appropriate for a project at this stage of the planning process. As is customary, additional detail would be developed following approval of the proposal and subsequent preparation of construction plans for the respective phases of the project. However, **Appendix C** has been modified for the Final EIS to include planting recommendations developed in planning for the wetland/habitat complex.

The project plans are intended to minimize the use of irrigation systems, proposing to irrigate only those areas that would require regular watering to remain functional (sports fields) and areas of planting that would require an establishment period. Areas of the project to be irrigated include the natural turf-sports fields, limited areas of "park, lawn and planting" (per sketch sk-3.0, **Appendix A**), "mixed forest" of the wetland/habitat complex (Project Development Plans, **Appendix A**) and "upland planting" of the wetland/habitat complex. The irrigation systems would be designed by a qualified irrigation designer to meet all park specifications and requirements. There would be two types of systems used. All areas with the exception of the upland forest should be irrigated with a fully automatic irrigation system with central controls to manage timing of watering and to respond to weather conditions. The upland forest areas would be manually irrigated with a system limited to a mainline with quick couplers at approximately every 150 feet throughout the upland planting areas. The intention of irrigation in planting areas is that it be used only during the plant establishment period, reducing the levels of irrigation over successive years until no irrigation is required.

Planting associated with the project is to be predominately native vegetation. The use of native plantings would include species from Washington, Oregon, British Columbia and Northern California that are hardy in the local Sand Point environment and named varieties of native species. The use of existing site vegetation is to be maximized where possible and appropriate. A variety of native trees and shrubs would be planted to support new upland habitats and create diverse seasonal and year-round wetland habitats. These trees and shrubs would be chosen to reflect and enhance existing vegetation, respond to hydrologic conditions and create new environments. During design development and preparation of construction documents, specific plants, locations and sized would be determined.

Issue PD 5: Level of information on plans for sports fields

Issue: A number of comments cited a desire for additional information on how the decision for artificial and natural turf fields was made, whether the life cycle costs of each were evaluated before the decision was made, and where used artificial turf would be disposed of in 10 years when it wears out. Other comments wanted information on how the various fields were sized and were seeking reassurance that soccer fields would accommodate ultimate Frisbee games as well.

Applicable Comments: A1-1, A4-8, I37-8, I95-3, I334-7

Response:

The process and reasons for selecting synthetic field surfaces for the proposed sports fields are discussed at several locations in the EIS. **Section 2.1.1** reviews the history of the planning process related to the

proposal, through which the Department of Parks and Recreation and/or the Seattle City Council established direction for both synthetic surfaces and field lighting systems. **Section 2.5.3** summarizes the City Council's reasoning for use of synthetic surfaces on some sports fields, as a necessary action to provide sufficient capacity in response to the growing demand for sports field use. The prior response to issue SEPA 3 addresses the same considerations of field surface and capacity.

In the Seattle climate, natural-turf sports fields cannot sustain regular use throughout the year; DPR management practice is to allow natural-turf fields to rest from November through February. Natural-turf fields also cannot sustain the level of use that would result with lighted evening play from March through October. A single natural-turf sports field without lights can support approximately 1,400 to 1,500 hours of scheduled play during an 8-month use season. A single synthetic-turf sports field with lights can accommodate over 3,200 hours of scheduled play in a 12-month period. Because synthetic-surfaced fields can accommodate such a higher level of use and because some fields must be available for year-round use, the City of Seattle has a policy preference for providing lighted, synthetic-turf fields where appropriate. Life-cycle costs were carefully considered in developing this policy.

The new generation of synthetic-turf materials has not yet gone through the first replacement cycle, so the extent to which these materials can be recycled is not clear. Traditional or earlier versions of synthetic-turf field systems were made with similar materials, and replacement of those surfaces typically resulted in disposal of the worn-out turf in a landfill. With present technology and industrial practices, it is possible that properly separating the synthetic-turf materials for recycling is not feasible. Given the historical rate of change in the field, however, it is not unreasonable to assume that some level of recycling for the proposed field surfaces would be feasible by the time they would need to be replaced, which would likely be in 15 to 20 years. To address the challenges of post-consumer recycling, the Carpet and Rug Institute (CRI) has assembled a committee of member representatives to rally industry expertise and resources to promote recycling. The committee will work toward perfecting a system for identifying carpet materials, to make sorting and separating of fiber and backing compounds much easier in the future. Many CRI companies are already using such an identification system, and the CRI committee will share technology that will accelerate the recycling of used carpet materials back into raw materials and the development of a "closed-loop" recycling system. The synthetic-turf systems under consideration use materials such as polyethylene, polypropylene and polyester cord fibers, similar to carpet materials, plus other materials such as geotextile fabric, silica sand and ground rubber. It should also be noted that the new generation of synthetic-turf systems incorporate a significant amount of previously recycled materials, such as the granular rubber material used as infill.

Several comments related to the sizes of the proposed fields. The dimensions for the proposed soccer fields are in accordance with the standards of FIFA, the international governing body for soccer. The runout areas between the soccer field sidelines and the limit of the turf surfacing are consistent those recommended by the NCAA for collegiate soccer play. Several of the synthetic-turf sports fields are sized to accommodate ultimate Frisbee games, and the field complex would be able to support five full-size ultimate Frisbee games and several reduced-size scenarios. In addition, the synthetic turf systems are proposed to include colored inlays to mark corners of the fields and allow for easy field set-up.

Issue PD 6: Wetland design characteristics and location

Issue: One comment stated a need for the proposal description to include boulders, brush piles, snags, and large woody debris in wetland habitats. The comment took the position that these items

should not be included as mitigation for wetland impacts, but as part of the proposal. Another comment questioned the location for the proposed lagoon.

Applicable Comments: A7-9, I36-1

Response:

Section 2.2.5 of the EIS provides a comprehensive, planning-level description of the wetland/habitat complex components that would be developed through the proposal. These habitat elements, and the specific structural and vegetative characteristics needed to make them functional, are included as a key element of the proposal and are not identified as mitigation. Discussion of mitigation measures in **Sections 3.3** and **3.4** explains that some of the habitat development would occur as mitigation for existing habitat displaced by the development components of the project, while the remainder would represent enhancement of existing habitats.

Plans for the wetland/habitat complex of the proposed action have been developed to an appropriate level of detail for this stage in the planning process. Additional design detail will be developed for the Section 404 permit application and site-specific construction plans. Habitat details such as placement of brush piles, snags, boulders and large woody debris can and will be incorporated at those subsequent planning stages. Additional site-specific detail will be provided through implementation of the Vegetation Management Plan for Sand Point Magnuson Park, which was adopted by the Seattle Parks Board on December 13, 2001. As an adopted City Plan, the City is obligated to carry out the provisions and guidance detailed in the VMP, just as it is required to carry out the provisions of any of its codes and plans. The VMP was written to address the existing conditions at Sand Point Magnuson Park. Although planning for the habitat/sportsfield complex project was underway, it was determined that it was more appropriate to write the VMP for existing conditions. However, the overall goals, objectives and policies described in Sections 2 and 4.2 of the VMP are appropriate for the park in existing conditions, and when/if the proposed action plan is initiated. The VMP will provide specific direction, beyond that described for the wetland/habitat complex in the EIS, that would apply to the types of habitat characteristics referenced above.

With respect to the location and merits of the lagoon proposal, **Section 2.2.5** of the EIS presents the rationale and objectives for this key feature of the wetland/habitat complex. In summary, the lagoon is intended to provide valuable near-shore aquatic habitat, a habitat resource that has declined markedly over the years within the lake Washington basin. The lagoon would displace relatively little shoreline land along the lake, and would actually increase the length of freshwater shoreline within the park.

Issue PD 7: Type of fill material for site construction

Issue: A few comments questioned the proposed use of crushed asphalt as fill/subgrade material for the athletic fields. One comment stated opposition to this use and instead favored the use of natural soil material from the wetland area. Two comments questioned the use of crushed paving material or asked what types of construction/demolition debris would be used as fill in construction of the project, and what pollution would be contained in runoff from this material.

Applicable Comments: O7-5, I334-5, T5-6

Response:

Although most of the soil excavated for the wetlands would be used as fill for the fields, it is much more moisture sensitive than crushed pavement or concrete. As a result, crushed pavement or concrete would provide a better structural fill. In addition, recycling crushed pavement or concrete for use as structural fill (subgrade material) for the fields would be more environmentally responsible than exporting the on-site material and importing structural fill.

The use of crushed pavement or concrete as structural fill for the fields should not have an adverse impact on the stormwater runoff from the fields. The proposed design of the fields includes a subdrainage system that would intercept and convey stormwater runoff toward the wetlands before the runoff infiltrates into the structural fill. Therefore, runoff to the wetlands would have generally traveled through the field section sands, not the structural fill below the field section.

Issue PD 8: Provisions for bicycles and pedestrians in park transportation plan

Issue: Several comments addressed the access and circulation elements of the proposal, primarily with respect to bicycles and pedestrians. One comment asserted that bicycles and pedestrians need to be included in the Park transportation plan, and that bicycles needed to obey all traffic safety laws and regulations. Other comments stated that bicycles and pedestrians need to be separated on the proposed trail system in the park for safety reasons. One comment requested the provision of safe bicycle access from the Burke Gilman Trail to the north end of Sand Point Magnuson Park.

Applicable Comments: O14-5, O14-6, I95-5, I173-1, I261-1, T14-1

Response:

Bicycles are an integral part of the project's pedestrian circulation/ trail system (**Section 2.2.7, Figure 2.2-3**). The design reinforces the role of bikes as an important component of the park transportation plan by strengthening connections to the Burke Gilman trail, particularly along NE 65th Street where a designated bikeway begins at the intersection with Sand Point Way and extends through the site, paralleling NE 65th Street and Beach Drive and ending at the swim beach. The design further addresses key circulation connections to be strengthened with adjacent uses in the park, to improve circulation for pedestrians, bikes and cars. Design of a full transportation plan for the entire park, incorporating bikes, is beyond the scope of the project being studied in this document.

The access and circulation plan for the project identifies trails as "pedestrian" and "bikeway," but these are not exclusive designations. This defines the intended use, but allows some crossover of the circulation system to facilitate sharing between multiple user groups, with pedestrians having right-of-way. The only trails that are intended exclusively for pedestrians are the secondary pedestrian ways, with physical obstructions preventing bike access.

Issue PD 9: Selection/description of elements of the proposed lighting system

Issue: A number of comments questioned the lighting standards and technology proposed for use in the project, and/or made requests to change the characteristics of portions of the lighting system proposed for the athletic fields. Specific aspects addressed by these comments included the use

of 1,500-watt bulbs; use of adjustable lighting systems that could be operated at variable brightness levels; technologies to shield lights and reduce glare; types of luminaires to be used; use of IESNA standards for lighting levels in exterior environments; and the use of full-cutoff fixtures.

Applicable Comments: O3-3, O6-1, O11-3, O15-31, O16-2, O16-3, I204-1, I281-4, I309-2, I316-2, T5-4

Response:

As discussed in **Section 2.2.9**, all of the athletic field lighting systems are proposed to meet Class IV lighting levels defined by the Illuminating Engineering Society of North America. The proposed levels meet the minimum requirements for safe play on the types of sports fields included in the proposal. The use of 1,500-watt lamps would not reduce the number of poles required for the project, and would only reduce the quantity of floodlights to 2/3 of what is currently proposed. The use of 1500-watt luminaires and fewer poles would also preclude the use of full-cutoff floodlights, which appears to be the type of luminaire preferred by the local community. The latest shielding technology for athletic field lighting systems would be utilized to minimize glare and skyglow. Full-cutoff luminaires would be used on 9 of the 11 lighted fields, while floodlights with extended external visors would be used on the two larger baseball fields. In summary, the proposed sports field lighting component of the proposal is already consistent with most of the suggestions in these comments, in that the proposal includes the best available technology to limit glare, spill light and skyglow. The proposal is also consistent with the lighting design guidelines adopted by the City of Seattle to limit lighting impacts on neighborhoods.

Issue PD 10: Requested changes or additions to the proposed action

Issue: Numerous comments requested additions or changes to various elements of the proposed project. Specific topics covered in these comments included provision of facilities for in-line skaters, including a covered indoor area; more bikeways; restaurants or food services; fenced playgrounds; more sports meadow fields; sidewalks; more trails; graphics used to describe the proposal; and fields for lacrosse.

Applicable Comments: I104-1, I105-1, I106-1, I130-1, I185-1, I232-2, I258-1, I338-1, I347-1, I366-2

Response:

In general, these comments addressed detailed design considerations that are beyond the scope of the EIS and the current level of planning for the project. These concerns and suggestions will be retained for reference in future design work on the project, and can be incorporated into designs for specific features as appropriate. The proposed action is consistent with the planning guidance for Sand Point Magnuson Park that the Seattle City Council has provided through several resolutions adopted in recent years.

Issue PD 11: Comparison to lighting system at Safeco Field

Issue: One comment letter stated that the lighting proposed for the athletic fields at Magnuson Park would be on the order of lighting used at Safeco Field, and provided a detailed tabular comparison of the two facilities.

Applicable Comments: I328-2, T16-1, T23-8

Response:

The intent of this comment appears to be to make a point about the magnitude of the lighting system proposed for the Sand Point Magnuson Park sports fields. The comment does not provide a specific context relative to the alternatives evaluated in the Draft EIS, lighting impact issues or mitigation measures, however, and does not provide an indication of the course of action preferred by the writer. Safeco Field and the proposed Sand Point Magnuson Park sports field complex both are/would be lighted athletic field facilities, but that is approximately the extent of their similarities. Based on the specificity and content of the comment, no further response to this comment can be provided.

4.2 ELEMENT/RESOURCE ISSUES

4.2.1 Earth (GEO)

Issue GEO 1: Potential for soil contamination on the project site

Issue: One comment stated that there is expected soil contamination on the project site. Therefore, the project should include soil and groundwater sampling to determine the level of clean up required for subsequent use of the site for recreation and wetland creation.

Applicable Comments: A8-1

Response:

According to the Washington Department of Ecology (DOE), some soil contamination is "expected" near the former Navy Commissary. This expectation is based on "folklore" that indicates items were buried in this vicinity, including vehicles, furniture, and garbage. The DOE also anticipates that contamination from the gas station (near Sportsfield Drive) has migrated to this area. If the Navy did not clean up the anticipated contamination in this area before vacating the site, soil and groundwater sampling would help determine the level of clean-up required, as discussed in the modified text for **Section 3.1.2**.

Issue GEO 2: Description of landscaping impacts

Issue: One comment stated that a description of landscaping impacts could be included in **Section 1.5.2** of the EIS.

Applicable Comments: A4-5

Response:

This comment specifically references the list of earth and water mitigation measures presented in **Section 1.5.2** of the Draft EIS. This is a summary listing of mitigation measures, in which a description of landscaping impacts would be improperly located. Impacts from landscaping and other construction activities for the project on earth and water resources are addressed in detail in **Sections 3.1** and **3.2** of the EIS.

4.2.2 Air Quality (AQ)

Issue AQ 1: Barge transport for site fill materials

Issue: One comment stated that barges should be used to transport materials to and from the construction site to decrease noise and air quality impacts. The use of barges would reduce the number of trucks using local roadways to bring materials to the construction site.

Applicable Comments: A2-1

Response:

This comment is consistent with and appears to be supportive of similar statements made in **Section 2.2.11** of the Draft and Final EIS. No further response is necessary.

Issue AQ 2: Demolition requirements relative to asbestos

Issue: One comment stated that asbestos surveys are required prior to demolition of any buildings on site. Buildings on site were constructed during the time period that asbestos was readily used in construction, therefore, buildings need to be surveyed and cleaned up during construction.

Applicable Comments: A2-2

Response:

The Department of Parks and Recreation appreciates this summary of survey and notification requirements for demolition activities. Demolition undertaken for the proposed action would comply fully with applicable laws and regulations.

Issue AQ 3: Control of dust emissions from construction

Issue: One comment indicated there was a need for measures to control dust emissions during construction, and identified several applicable measures.

Applicable Comments: A2-3

Response:

The Department of Parks and Recreation appreciates this summary of suggested dust control measures for construction activities. The list of mitigation measures in **Section 3.1.5** of the Final EIS has been edited to demonstrate consistency with the recommended measures.

4.2.3 Water (WTR)

Issue WTR 1: Impacts of project water consumption

Issue: One comment letter included several separate comments requesting information on the amount of water that would be necessary for irrigation of landscaping, and how much water would be consumed for overall site irrigation, restrooms in the park, food facilities, and the pools. Comments also stated that deduct meters and flow sensors should be installed on site.

Applicable Comments: A4-4, A4-6, A4-10, A4-16

Response:

The Final EIS, particularly **Section 3.5**, has been modified to provide more information on anticipated water consumption. Consideration of specific hardware such as deduct meters and flow sensors is a detailed design issue that is beyond the scope of this EIS. Comments A4-6 and A4-16 are somewhat vague as to what is expected to "adequately address the impacts of water consumption" and pay "special attention to" increased water use, so a more specific response is not possible. The reference to pools in comment A4-6 is unclear; there are no swimming pools in the proposed project, and the marshy pools in the wetland/habitat complex would be fed by drainage from the sports field complex.

Issue WTR 2: Use of chemicals to clean fields and need to treat runoff

Issue: One comment letter questioned whether chemicals would be used to clean the artificial-turf fields and whether the runoff from the fields would be pre-treated before entering wetland areas because of this use.

Applicable Comments: A4-9, A4-12

Response:

No chemicals are to be used to clean the synthetic-turf fields. Maintenance on the fields (discussed in **Section 2.2.13** of the EIS) would be limited to mechanical cleaning of the synthetic fields, including sweeping, blowing, vacuuming. The runoff from the synthetic surface fields is considered "clean" and would require no pretreatment before entering the wetland/habitat complex (see **Section 2.2.5**, Site Drainage Patterns).

Issue WTR 3: Measures to promote water quality, waste reduction and conservation

Issue: One comment noted that **Section 2.2.13** in the EIS did not address how operation and maintenance of the project would promote water quality, waste reduction and water conservation, while another comment in the same letter asked whether there were water re-use opportunities.

Applicable Comments: A4-11, A4-13

Response:

Proposed maintenance and operations are intended to minimize impact on water quality and water use, while maximizing the value of water on the site. Specific measures to promote those objectives would be developed when project-specific operation and maintenance plans are prepared.

Monitoring stations (to determine and track water quality, quantity, and temperature) are proposed to be located throughout the site. These stations would also operate as indicators of the effectiveness of upstream water quality facilities and the long-term maintenance requirements for the facilities.

The use of irrigation is to be minimized to reduce water use. Irrigation systems are to be limited to only those areas requiring regular water for continued operation (sports fields) and for areas of planting that would require an establishment period. Irrigation use in the latter areas would be reduced from year to year, and ultimately eliminated. A fully-automatic irrigation system with central controls to manage timing of watering and to respond to weather conditions, watering only when conditions warrant, would be used for the areas irrigated on a long-term basis. Regular maintenance of the natural-turf fields would reduce the extent of problems such as weeds, insects and disease, reducing needs for herbicides and pesticides. All water entering the project, either from off-site, as rain, or as irrigation runoff, is to be captured and reused as part of the flow-through wetland/habitat complex system that would move across the site from west to east, ultimately entering Lake Washington.

Issue WTR 4: Need for monitoring of stormwater runoff

Issue: Numerous comments stated that stormwater runoff to wetland areas should be monitored due to the presence of asphalt parking areas, herbicide and fertilizer use on athletic fields, and silt from construction areas among other things. Comments further stated that the proposed action should include the use of oil/water separators in the drainage system.

Applicable Comments: A7-5, A7-7, O1-4, O7-6, O15-11, O15-13, I12-3, I37-5, I61-4, I85-7, I209-9, I268-10, I334-4, T23-7

Response:

Several different types of water treatment facilities are included in the proposed action. These facilities range from "natural" (biofiltration swales and ponds) to "hard" (concrete treatment vaults with filters and/or oil/water separators). Monitoring stations (to determine and track water quality, quantity, and temperature) are proposed to be located throughout the site. These stations would also operate as indicators of the effectiveness of upstream water quality facilities and the long-term maintenance requirements for the facilities. See figure DR-7 of the Preliminary Storm Drainage Report (**Appendix B**) for potential water quality monitoring station locations.

Issue WTR 5: Impervious surface area data

Issue: A few comments requested clarification of the amount of impervious surface calculated for the project, indicating that different numbers were used throughout the EIS document. Comments requested information regarding what areas are included in the calculations of impervious

surfaces and also questioned whether or not the baseline conditions were accurately measured for this project.

Applicable Comments: A7-6, I85-11, I85-19

Response:

The Department of Parks and Recreation acknowledges that there were minor discrepancies in the figures cited for impervious surface area in different locations in the Draft EIS. This information has been checked and edited carefully for the Final EIS to attempt to ensure consistency.

The impervious surface area figures cited in the EIS refer only to area within the boundaries of the project site, and not to impervious surfaces elsewhere in Sand Point Magnuson Park (which would not be affected or would not change as a result of the proposed action). The boat launch area and adjacent parking lot are specifically not included in the impervious surface data presented in the EIS. Both the natural-turf and synthetic-turf sports fields are included in the pervious surface category, as these fields would be constructed to rapidly infiltrate precipitation.

Issue WTR 6: Basis and feasibility of the site drainage design

Issue: Two comments raised the issue of whether there is a scientific basis for the site drainage design, or whether the design is an experiment by project architects. Other comments questioned whether the design would work during periods of heavy rainfall.

Applicable Comments: A4-14, O15-12, T5-7

Response:

The site is engineered as documented in the Preliminary Storm Drainage Report (**Appendix B**). The project drainage plan was developed through standard professional practices using reliable input data and accepted scientific analysis tools. The site drainage system is designed to function effectively during both dry and wet periods. This means that although some of the wetlands are designed to dry out, others are designed to remain wet year-round. In addition, all the wetlands on site are designed to accept and release runoff from very large storm events with very small fluctuations in pond water surfaces. The Preliminary Storm Drainage Report provides the design support backup (calculations) for the capability of the drainage system.

Issue WTR 7: Water levels in the proposed lagoon

Issue: One comment asked about the maximum depth of the proposed lagoon and raised the issue of how the water level in the lagoon would be affected by fluctuations in water levels in Lake Washington.

Applicable Comments: O15-15

Response:

The lagoon would be hydraulically connected to Lake Washington. This means that the water surface elevation of the lagoon would be the same as the elevation as Lake Washington. In summer, the U.S. Army Corps of Engineers raises the water surface in Lake Washington to roughly an elevation of 19.0 feet (NAVD88 Datum). In winter, the Corps lowers the water surface to elevation 16.8 (NAVD88). The Corps makes this adjustment through operation of the Hiram M. Chittenden Locks. The site has been designed to drain to the lagoon during both summer and winter. Therefore, the outlet elevations for the upstream ponds (that drain to the lagoon) are above the summer elevation of 19.0 (NAVD88).

4.2.4 Plants/Wetlands (WET)

Issue WET 1: Post-construction monitoring of wetland/habitat creation

Issue: Several comments stated that there should be monitoring to determine whether the wetland creation for the project is a success; some noted a recent study published by King County indicated that approximately 90 percent of all created wetlands are not functioning as anticipated. Some of these comments said the proposal should include maintenance to correct any part of the wetland system that is not functioning as intended.

Applicable Comments: O1-2, O15-1, O15-25, I37-3, I122-1, I172-3, I268-5, T8-5

Response:

Monitoring of all habitat installations (upland and wetland) would be included as part of the project permit application process to the City of Seattle, the Washington State Department of Natural Resources, Washington State Department of Ecology and the U.S. Army Corps of Engineers. As outlined in the Draft EIS, permits from the City, State, and Federal government agencies would be required for any work in wetlands and/or shoreline habitats of the site. Monitoring plans would be designed and implemented with guidance from the regulatory agencies, and it is assumed that a 5 to 10 year monitoring period would be required for a project of this magnitude. As to the success of created wetlands, the studies from King County, Washington State Department of Ecology, and the National Academy of Sciences that identify the extent of failure have also identified the many causes of those failures, the three most common being: poor design, poor implementation (or no implementation, in some instances), and poor follow-up by the regulatory agencies. Often it is "mitigation" associated with private development permits that fail, as regulators do not track permit requirements, and the private development applicant often is not associated with a project once it is constructed and occupied. Sand Point Magnuson Park is a public facility with an informed, vocal, and strong advocacy community watching and "bird-dogging" the Park staff. It is expected that the stewardship element of that advocacy community, as well as graduate students from the University of Washington Restoration Ecology Network and K-12 private and public schools, would all be integrated into the ongoing implementation and monitoring program for the habitat enhancements proposed. In this situation, it is not expected that any identified failures of the enhancement actions would be left undocumented or unremedied.

Issue WET 2: Sufficiency of information on mitigation for wetland impacts

Issue: A number of comments asserted the need for additional information on wetland fill impacts and replacement ratios for these impacts. Comments also requested that a wetland delineation be completed and included in the EIS and that the mitigation for the net loss of existing wetlands be stated. Other comments questioned the assumption that creation of manmade wetlands is better than the existence of "wild" wetland habitat. Still other comments requested the expansion of the grass sports meadow into wetland areas, stating that the loss of wetland habitat would be minimal compared to the gain in recreational space for park users.

Applicable Comments: A7-1, O1-6, I37-2, I85-3, I85-6, I85-17, I95-2, I220-2, T44-4, T46-4

Response:

As noted in the response to issue WET 1, permit applications for the proposed project will include detailed plans, drawings to scale, topographic survey, detailed engineering analysis, planting plan layouts, monitoring requirements, quantifiable performance standards and locations of habitat components, construction sequencing, function assessments and monitoring requirements and, maintenance and contingency plans.

This project is not a 'typical' wetland impact project and wetland mitigation proposal. While there are wetland impacts associated with the placement of the sports fields, the proposed wetland enhancement and wetland creation elements are not proposed simply as compensatory mitigation for those impacts. Prior to the inclusion of the sports field component to the reuse plan for Sand Point Magnuson Park it was proposed to only provide habitat improvement throughout the entire eastern portion of the park. That work would have also required the same spectrum of permitting from the city, state and federal resource agencies as will the proposed action.

At the time of permit applications, Sand Point Magnuson Park staff and their representatives will coordinate with City of Seattle staff and staff of the U.S. Army Corps of Engineers to determine if a formal wetland delineation across the entire site will be required, or if, as is proposed, a 'worst case scenario' approach will be taken to calculate the majority of the existing habitat areas as wetland. This approach is currently being recommended to the City based on the highly disturbed nature of the soils and vegetation on the site, which makes typical delineation a severe challenge. Rather than spending public funds attempting to accurately delineate the intricate mosaic of wetland vs. upland meadow, a more pragmatic approach of simply designating broad areas as wetlands will be proposed to wetland regulatory staff of the City and the Corps. In this manner it is assumed that the permit application will adequately account for all existing wetland resources present on the site.

Because the scientific literature findings on the effects of sportsfield lighting on wildlife use is unclear, it will be recommended as part of the monitoring program for the various permit applications that monitoring of amphibian, invertebrate and wildlife use of the habitats within the park be included as part of the adaptive management plan for the park. It is known that monitoring of the proposed habitat areas will be required for both the state and federal permits the proposal would require. By including monitoring use of various habitats close to the lighting sources compared to 'control' habitats out of the glare of the light sources, the City can document effects, if any, of the sports field lighting on wildlife. Then appropriate contingency actions ranging from more effective shielding of the lights, changing the

use patterns and lighting patterns of the sports fields, or increasing artificial screening could be implemented as needed. Lack of definitive answers regarding lighting impacts in the scientific literature does not permit a conclusion that impacts would or would not occur. Only monitoring of onsite conditions after installation, and a commitment to identify and implement effective contingency actions, would adequately address those concerns.

Issue WET 3: Human disturbance and related impacts to wetlands

Issue: A number of comments cited the possibility for significant human disturbance and resulting impacts to wetland areas. Commenters wanted to know how the Parks Department is going to minimize disturbance to wetland areas.

Applicable Comments: A7-2, O1-1, O15-23, I146-4, I148-1, I209-9, I285-11, I333-3, I334-6

Response:

In existing conditions, humans have free access to all habitats across the entire Sand Point Magnuson Park site. Any visitor who has spent time in the 'interior' portions of the park knows that humans widely use an intricate network of informal footpaths that criss-cross the entire site, making no portion of the 'habitat' area off-limits. In fact, in public meetings, members of the public have expressed concerns that proposed conditions would preclude human access to large portions of the interior of the habitat zones of the park. Proposed conditions to limit access to habitat areas reflect the strong message received during the Wetland Charrette design process in the summer of 2001: create and maintain the interior portion of the habitat complex as human-free as possible to maximize habitat use for more sensitive wildlife species. The design attempts to achieve that goal by removing the existing trails that circumnavigate every wetland on the site; by designing trails to have access to portions of representative wetland types, most often on the 'outside' (roadside) edge of those wetland types; by providing habitat overlooks from the existing bunkers on the north side of the habitat area, as a means to provide visual access while limiting direct human access; and by signage and subtle fencing to direct users towards pathways.

No design can completely preclude human actions. There will always be those park users who determine, for a variety of rationalizations, that the rules do not apply to them. Therefore, it is expected that there would be some park users who insist on going into the interior of the habitat zones. There might also be instances in which small groups of individuals are allowed access to interior areas for monitoring and/or recreational purposes. And, of course, bird monitors would want access to all portions of the park to document use patterns in all seasons and all habitat zones.

Self-policing by other park users may be the most effective manner by which inappropriate access to interior portions of the habitat zones can be reduced. It should be expected that human access to the interior zones cannot be precluded unless overt use of extensive fencing is incorporated. Based on comments received in community outreach efforts for the wetland/habitat planning process, that option was not considered a realistic solution for the entire wetland/habitat complex. However, limited areas of fencing, perhaps disguised or hidden within vegetation, might be used to prevent human use in selected strategic areas.

Issue WET 4: Need for herbicide use on athletic fields

Issue: One comment questioned the use of herbicides on the natural-turf sports fields, since the fields would be mowed regularly. The commenter further stated that herbicides would reach the wetland areas through runoff and would impact wetland plants. The commenter wanted to know if it really matters if there are weeds in the fields.

Applicable Comments: A7-4

Response:

Sand Point Magnuson Park has been managed for many years as an herbicide, pesticide, and insecticide free park. Park maintenance staff have supported this commitment in project planning discussions, and the incorporation of such chemical applications into future management options has not been assumed. **Section 2.2.13** of the EIS has been modified to more clearly address this point.

Issue WET 5: Clarity of species identification

Issue: One comment stated that the identification of some species in the EIS was unclear.

Applicable Comments: O15-22

Response:

The orchid species present at Sand Point Magnuson Park is *S. romanzoffiana* (also known as *S. romanzoffiana var. romanzoffiana*). This identification is based on field confirmation, information contained within Flora of the Pacific Northwest (Hitchcock and Cronquist, 1973) and personal communication with J. Gamon of the Washington Natural Heritage Program. *S. romanzoffiana* is not identified as a State Sensitive species. It is noted as being common on disturbed sites such as Sand Point Magnuson Park (J. Gamon, Washington Natural Heritage Program). The more sensitive species of orchid, *Spiranthes porrifolia* (also known as *S. romanzoffiana var. porrifolia*) is listed as a State Sensitive species in Washington, as cited in the Field Guide to Washington's Rare Plants (Washington State Department of Natural Resources and Spokane District Bureau of Land Management, 2000). The two species are quite similar appearing, but they have quite distinct habitat needs, and only *S. romanzoffiana var. romanzoffiana* would be expected in the highly disturbed conditions of Sand Point Magnuson Park. Botanists from the State Natural Heritage Program supported this conclusion.

Issue WET 6: Need for amendment of disturbed wetland soil

Issue: One comment regarding **Section 3.3** stated that soils that are disturbed on the site should be properly amended.

Applicable Comments: A4-14

Response:

Soil conditioning is proposed to provide adequate soils for all non-sports field areas of the project site. Topsoil is to be manufactured on site using an estimated 6-inch stripping depth, to be stockpiled and incorporated with organic composted mulch (from on-site and imported material) to create topsoil for distribution over all planting areas at a depth of 6 to 8 inches. In addition to the manufacture and installation of this topsoil, it is proposed that the subgrade in all areas designated as upland planting, mixed forest, and marsh meadow would be further conditioned. This conditioning will include the addition of a mulch top dressing and seeding with a nitrogen fixing cover crop, to be tilled under after a minimum of one growing season, prior to the installation of the site manufactured topsoil.

Issue WET 7: Location of sports fields relative to wetland area

Issue: One comment wondered why the City planned to locate sports fields 8 and 9 on top of a rare wetland area that was purported to be one of Washington's finest examples.

Applicable Comments: I36-2

Response:

Section 2.2 of the EIS explains the rationale for sports field and wetland/habitat configuration represented by the proposed action. **Section 3.3** of the EIS describes the existing wetland habitats on the project site; this includes the wetland area in question, which is a part of the wet meadow community discussed in **Section 3.3.1.3**. **Section 3.3.1.4** of the EIS includes a functional assessment of the existing wetland communities, which concluded that the wetland types on the site generally rate low to moderate for all wetland functions. The wet meadow habitats of Sand Point Magnuson Park are present due to the past disturbances on the site. These wetlands are not historical remnants of Mud Lake and its associated peat bog community. The filled and graded soils on the site preclude precipitation from soaking into the ground, therefore shallow inundation is common across the site for much of the winter. This pattern precludes upland grasses or shrubs from colonizing and only allows the establishment of species adapted to both shallow inundation and summer drought conditions.

4.2.5 Wildlife and Fish (WDLF)

Issue WDLF 1: Impacts of lighting/human disturbance on wildlife

Issue: Many comments raised general or specific issues involving the impacts that the sports field complex could have on wildlife. Most of these comments addressed potential or suspected impacts of athletic field lighting on wildlife, including wetland areas and fisheries. Commenters stated that this impact needs to be more fully analyzed in the EIS because there are many species that would be affected, and that the issue is inadequately addressed in the document. Some of these comments also stated that not enough mitigation is offered to minimize or avoid lighting impacts to wildlife. Similar comments specifically addressing potential human disturbance impacts from noise, or noise and lighting in combination, are included in this issue category.

Applicable Comments: A7-3, O1-5, O2-15, O2-16, O7-1, O8-2, O14-8, O15-7, O15-14, O15-17, O15-26, O15-27, O15-29, O15-33, O16-1, O16-5, O17-2, I37-9, I41-2, I61-3, I67-4, I68-1, I103-1,

I119-3, I122-3, I146-3, I148-1, I149-3, I193-4, I209-5, I215-1, I215-4, I221-1, I221-2, I221-4, I229-1, I254-6, I266-1, I266-8, I268-2, I282-1, I284-3, I288-4, I296-3, I299-2, I301-4, I309-2, I309-4, I311-3, I333-2, I333-13, I333-18, I334-6, I342-3, I356-2, I367-4, T1-3, T5-1, T11-2, T11-3, T13-3, T13-7, T15-3, T15-6, T23-2, T28-2, T33-2, T43-3, T45-5, T46-3

Response:

The response material for this issue addresses the specific topics of sports field lighting disturbance and human presence and noise disturbance.

Sports Field Lighting Disturbance

Section 3.4.1.2 of the Final EIS has been modified to include more information about potential disturbance effects from sports field lighting on wildlife. Attempting to determine if the proposed lighting of the sports fields would have an effect on wildlife is difficult. There is no research specifically on the effects of tall, shielded sports field lights on wildlife, although there is evidence that some sources of artificial light have negative impacts on most guilds of animals that could use the wetland/habitat complex at Sand Point Magnuson Park. Extensive summaries of effects of artificial lighting from a recent conference in California (Harder 2002; Longcore and Rich 2001; Urban Wildlands Group and UCLA Institute of the Environment 2002) indicate that artificial lights have had adverse effects on a wide range of guilds including mammals, amphibians, reptiles, fish, and invertebrates.

The available scientific literature that was found assessed impacts of street lights, lights associated with towers and large buildings, and lights associated with tennis courts on wildlife. Extensive querying of experts and the scientific literature failed to find any studies of effects of sports field lights on wildlife. The sports field lights proposed for Sand Point Magnuson Park differ from street lights in that they would not be on all night, and they are generally taller and brighter than street lights. Tall lights would be visible from a greater distance and, while they would be fully shielded, they would shed some light into areas adjacent to the sports fields in the form of glare, spill, and glow.

Because the currently available research on lighting effects on wildlife is inconclusive with respect to sports field lighting, DPR proposes to monitor wildlife use in the newly created/enhanced habitats on the site. A purpose of this monitoring would be to compare and contrast use patterns in habitats within the lighting spill zone to those more interior on the site. Such comparative monitoring would inform the park staff as to the effects, if any, and inform adaptive management decisions to remedy identified problems.

Several options exist for mitigating potential light effects on the habitat areas. Options range from removal of the lighting near habitat areas, screening via use of full cutoff lighting, minimizing the hours the fields are lit or reducing the hours the lights nearest the fields are lit, and screening via use of vegetation and mounds. These options are discussed in more detail in **Section 3.4.1.5** of the Final EIS.

Human Presence and Noise Disturbance

The proposed action would result in increased use of the park by people in the sports field area as well as in the more passive areas of the park. Recognizing that concurrent increases and wildlife habitat would result in increased opportunity for wildlife/human/domestic dog interactions, design features to reduce adverse human/wildlife impacts were incorporated into the proposal. The proposed design has attempted

to limit cumulative impacts to wildlife by physically limiting access to the interior portions of the habitat area. Measures to limit access include designing overlooks that are heavily screened with "non-friendly" native shrubs that bear thorns to reduce volunteer trail development, and providing over-water access for views and education opportunities in locations where wetlands are already closest to roads and human activities. Trails and viewing sites are designed to guide visitors through the margins of wetland areas and some upland buffer habitats, but no wetland would be completely circumnavigated by trails and/or roads. Informational handouts and signage are proposed to educate and encourage visitors to remain in approved locations, and discrete temporary and permanent fencing in strategic locations would block off-trail access to more sensitive habitats. Temporary fencing is proposed in all habitat restoration areas to limit human/dog access until installed plant material gains a level of maturity to provide natural blockage and/or preclude pedestrian access.

Human behavior is such that unwarranted access into habitat interior areas could not be fully prevented without perimeter enclosing fencing of such intensity that the entire character of the park would be destroyed. Elements to positively direct, gently correct and solidly preclude inappropriate or easy access to the most sensitive interior spaces have been designed into the habitat areas. It is perhaps ironic that there is a vocal group of park users who strongly object to limiting human access to the interior portions of the park, as well as to the elimination of the informal "volunteer" paths throughout the park. The park's multiple mandates assure there will be some disagreement over many design elements.

Section 3.4.1.5 explains that temporary and, if necessary, permanent innocuous fencing would be placed at strategic locations around the perimeter of the interior portions of the habitat zones to preclude inappropriate access. Fencing would be placed at the time of initial habitat planting and installation to assure protection of plants, exclusion of inappropriate access and protection of establishing wildlife populations. Moreover, **Section 3.4.1.4** states that new continuous perimeter fencing will surround the permanent Off-Leash Area, which would decrease the random entrance of dogs into the habitat area. In the past, dogs have been able to jump over the sagging temporary fencing.

Noise from the sports fields would increase due to increased use of the park, and would be more common in the evening. The noise associated with people does not affect all wildlife guilds equally. More reclusive species (owls, snipe, weasels, mink) might not use habitats near to the high-intensity sports field area. Less sensitive species (amphibians, invertebrates, some passerines and other birds) might not be as directly affected by human crowd noise. Wildlife adaptations to human presence can be quite variable; however, persistent presence and high-intensity use by humans would preclude some species from using available habitats when humans are present.

Screening the margins of the habitat areas nearest points of human access/presence could provide a visual barrier and reduce noise. Screening is proposed by means of vegetation and earth mounds between the sports fields and the west side of the habitat areas. Large areas of native trees and shrubs are proposed along the swim beach access road through the eastern edge of the habitat area, and forested habitat is proposed surrounding much of the lagoon. Traffic speeds would be posted at less than 15 mph in the park to assure safety for humans and wildlife, and to reduce noise.

Issue WDLF 2: Displacement of existing wildlife

Issue: A few commenters wanted to know where displaced wildlife would go during and following development of the project, what species would be harmed by construction and what invasive species (such as bullfrogs) might dominate some areas following development.

Applicable Comments: O2-18, I12-5, I334-8

Response:

There is wildlife habitat provided in existing conditions of the park. Removal of the open space along the western limits of the site and replacement of that area with sports fields would result in a net decrease in habitat available on that portion of the site. In the proposed action, the Commissary, existing trails, roads and an internal parking lot would be removed and replaced with a myriad of wetland community types and upland habitats, without interior human access. The design is proposed to provide an increase in available habitat types across the habitat zone of the park. Given the limitations of funding and construction, a phased approach to construction is proposed. This would result in loss of some habitat elements and increased temporary construction in sequence across the park. As stated in **Section 3.3.2.1**, vegetation clearing would be confined to a portion of the project site at any given time during the construction period.

It is a generally accepted premise of wildlife ecology that all available habitat niches are filled within a given landscape. Removal of habitat implies that resident, non-migratory species would not be able to successfully breed, raise young, or survive. In reality, it means that some adaptable species with wide tolerance ranges (American robins, starlings, English house sparrows, Norway rats, eastern gray squirrels) might physically shift locations and nest at higher densities, while species with more restrictive habitat requirements (Lincoln sparrows, mink, owls) might not successfully reproduce, and could possibly perish. However, it should be noted that the ultimate goal of the proposal is to create more diverse and complex habitat communities across the site, and reduce human and vehicular access to the central portion of the habitat area. Species using the habitats on site in existing conditions have established there since the Sand Point site was used as an active military base into the 1970s. Species recolonized the site after nearly 50 years of intensive military use. Therefore, it is reasonable to assume that wildlife would recolonize again in the future, after sequential habitat restoration is completed.

Some species, including ground-breeding and ground-dwelling birds and mammals, and birds that forage and take cover in upland meadows, (e.g. meadow vole, vagrant shrew, deer mouse, rat, rabbit), might decline in abundance due to the proposed actions to convert the seasonal saturated meadows into more long-term saturated wetlands.

The proposed habitat enhancement design has attempted to pre-empt the easy use of the site by non-native species such as bullfrogs. The aquatic habitats westward of the swim beach access road (west of the proposed lagoon) would not have a direct surface water connection to the waters of the lagoon and therefore the lake. This was designed purposefully to preclude the easy colonization of the wetland complexes by invasive non-native plant and animal species. Aggressive non-native species that are readily present in Lake Washington include bullfrog, bass, carp, purple loosestrife, yellow iris, and Japanese knotweed. However, by not providing a direct surface water connection from the lagoon into the interior, it is hoped to delay and/or totally avoid the colonization of the interior habitats by some of

these species. Species such as bullfrog that can move terrestrially might move across the landscape into the interior wetlands, or perhaps well-meaning members of the public would plant volunteer tadpoles into the interior wetland complexes. This cannot be avoided. Although there is concern about bullfrogs colonizing the wetlands, several studies of native amphibians in the Puget lowlands (Adams 1999; Richter and Ostergaard 1999; Ostergaard 2001) provide no evidence that indicates bullfrogs eliminate or reduce native amphibian populations. Pacific treefrogs use different microhabitat than bullfrogs, and there are many examples of ponds where Pacific treefrogs and bullfrogs coexist (Ostergaard 2001).

Plant species that colonize by seed dropped by birds or carried by mammals or humans can be controlled through swift removal, given careful monitoring.

Issue WDLF 3: Characteristics of on-site trails

Issue: Two comments stated that the proposed trail through the wetland area is too wide and could act as a barrier for some smaller species of wildlife.

Applicable Comments: O7-2, O15-16

Response:

The cross-country trail (see **Section 2.2.7**) is proposed at a 12-foot width. The cross-country trail is the primary proposed means of circulating around the wetland/habitat complex and would be "fed" by the primary, secondary, and cross-park trails. The 12-foot size is intended to accommodate the estimated traffic resulting from its important role in wetland/habitat complex circulation. The cross-country trial would have numerous culverts at all low points to allow water passage under the trail, which could be oversized to further facilitate movement of wildlife under the trail. The width of the trail will be further studied and reductions could be considered in later phases of design development.

Based on the literature, the proposed 12-foot-wide gravel cross country trail could be a barrier, actual or psychological, for amphibians, invertebrates, reptiles, or small mammals attempting to migrate across it (DeMaynadier and Hunter, Undated). However, no effects on eastern amphibians were found on roads 15 to 20 feet wide, and some salamanders were affected at roads 40 feet wide (DeMaynadier, pers. comm.). Research has not attempted to determine whether there is a difference in wildlife use between 8-foot wide and 12-foot wide roads (DeMaynadier, pers. comm.). The only available research identified the effects of roads with vehicular traffic, not trails with pedestrian traffic.

The site and surrounding areas are highly disturbed and fragmented, from a wildlife perspective, in existing conditions. The site is criss-crossed with a mixture of decommissioned paved and concrete roads used as trails, as well as numerous 'volunteer' dirt trails. All of the volunteer trails through the habitat areas would be removed, and the interior access road and central parking lot would be removed in the proposed action. Given the extent of various trail types throughout the habitat areas in existing conditions, the construction of a new 12-foot wide crushed rock cross-country trail around the wetland complex, coupled with the removal of all the other existing roads and trails, would not seem to pose a significant threat to wildlife.

Issue WDLF 4: Effect on park designation as an environmentally critical area

Issue: One comment pointed out that Magnuson Park is one of the City of Seattle's Environmentally Critical Areas for wildlife and would like more information concerning how the proposed action would affect this designation.

Applicable Comments: O15-4

Response:

The Seattle Department of Design, Construction and Land Use administers the environmentally critical areas designations, and would be responsible for reviewing permit applications for the proposed project. **Section 3.4** of both the Draft and Final EIS describes how the proposed action would result in a substantial increase in the diversity and value of wildlife habitat on the project site and within the park overall. Consequently, the Department of Parks and Recreation assumes the project would have no adverse effect on the subject designation, but instead would enhance and promote the ability of the park to support wildlife.

This comment has also been treated as a land use issue, because it relates to consistency of the proposed action with existing plans and policies. Please see the response to issue LU 1 and **Section 3.7.2** of the Final EIS for more discussion of this issue.

Issue WDLF 5: Control of user behavior/enforcement of park rules

Issue: Two comments raised issues relating to inappropriate user behavior, particularly the presence of off-leash dogs, and inquired whether the Parks Department would increase enforcement of existing park rules (e.g., leash laws) to protect wildlife in wetlands areas from disturbance.

Applicable Comments: O15-24, I149-6

Response:

Potential human disturbance effects in the wetland/habitat complex and measures to counteract those possible effects are discussed at multiple locations in the Draft and Final EIS, primarily in **Sections 3.3** and **3.4**. This topic is also addressed in the previous responses to issues WET 3 and WDLF 1. Control measures identified include fencing, plantings, signing, distribution of educational materials and the design of the pedestrian circulation system itself. Engagement of additional uniformed staff to patrol the wetland/habitat complex has not been identified as a specific need and is not noted in **Section 2.2.13** as a project operational measure. This issue relates to personnel needs for overall management and operation of the park, and would be monitored and evaluated on a continuing basis along with other operational needs.

There are several and-use mandates for Sand Point Magnuson Park. In addition to active sports fields, these include off-leash dog use, sailing access, tennis, community gardens, housing, preservation of historic buildings and viewsheds, kite flying, walking, swimming, motor boat access, and restoration of habitats. The project design has been developed with an effort to allow for a broad range of multiple uses. The restoration/creation of functional habitat in the larger interior portion of the site has been

designed in a manner that attempts to both provide effective habitat while still allowing functional use of the site by pedestrians used to full and free access. From a habitat perspective, it would be best to preclude human access to the entire habitat zone; from the perspective of pedestrian access, education and passive recreation (e.g., running, walking, bird watching), free access to the entire site has been a given since the City obtained access to the site. The design result for the proposed project is therefore one of compromise.

Issue WDLF 6: Impact of the lagoon on fisheries

Issue: Several comments raised issues concerning impacts that the creation of the lagoon would have on fisheries in the area, and the impact this would have to the lake bottom as well. Other comments requested information on impacts to fisheries from summer water temperatures and increased predation of juvenile salmon confined in the shallow waters of the lagoon.

Applicable Comments: I12-2, I37-4, I285-12

Response:

There are no fisheries habitat structures proposed within the lagoon, as large woody debris and large boulder/rocks in the water would provide lurking habitat for predatory fish such as bass. Therefore, based on input from a U.S. Fish and Wildlife Service fisheries biologist and City of Seattle salmon experts, the lagoon is not proposed to have fish habitat structures that one usually associates with flowing water systems. Use of the lagoon by targeted fish species (anadromous and resident salmonids) is anticipated only for small fry as they move from the Sammamish River or the Cedar River toward the Lake Washington Ship Canal. These small fish feed in the shallows all along the shore of Lake Washington in existing conditions, moving off-shore to avoid predators and watercraft. The lagoon is intended as additional shallow water refuge habitat. Knowing that bass are also present in such conditions, however, care was taken in the design to reduce cover habitat for predators such as bass.

The lagoon is designed to have a year-round open water connection to the lake, as well as to be deep enough to intercept the groundwater in that area of the park. Therefore, it would have a year-round flow of water out towards the lake, although the rate of flow would be reduced in the late summer months when rainfall is lowest. This is also the time of year when the lake level is kept the highest by the Corps of Engineers, so the lagoon would be the deepest during the warmest time of the year. In addition, the lagoon is designed to be surrounded, eventually, by mixed coniferous/deciduous forests on the south, west, and north sides, to minimize solar radiation as the trees mature.

Additional discussion that applies to this issue is included in the response to issue WDLF 7, below.

Issue WDLF 7: Information on endangered species and ESA compliance

Issue: One comment asserted that information on threatened and endangered species from the Department of Fish and Wildlife was not referenced or documented in the EIS. The comment stated that a bald eagle is seen regularly within the park and there is no information in the EIS about this bird. The commenter further stated that the habitat requirements of threatened species was not presented in the document and questioned why a Biological Assessment was not completed for this project.

Applicable Comments: I85-4

Response:

A Biological Assessment (BA) would be required of this project at the time of application for a federal permit, most likely under Section 404 of the Clean Water Act, as administered by the Corps of Engineers for activities in wetlands or "waters of the U.S." such as Lake Washington. A BA is not required as part of the SEPA process, although a BA is sometimes prepared concurrent with a SEPA EIS.

Listed Fish Species

Providing increased shallow shoreline habitat along Lake Washington was envisioned as a benefit to native resident and anadromous fish in the lake. Regional experts on salmonids were contacted and a field visit conducted to determine whether the proposed lagoon would pose a risk to young fish or would provide beneficial habitat. Input from City of Seattle and U.S. Fish and Wildlife Service fisheries experts (K. Kurko and R. Tabor, personal communication) confirmed that the lagoon might provide some benefit to young fish of various species and would not increase predation by non-native predators if certain design precautions were incorporated. Design elements that are purposefully not included in the lagoon include large woody debris, large rock/boulders or other potential hiding places for predatory bass. The shoreline of the lagoon is proposed to have mosaic of shallow sloping sandy shores, shallow emergent marsh, and steep bank shoreline around the perimeter to provide refuge and feeding habitat for small fish. Shallow water, less than 12 inches deep is not a preferred habitat for predatory fish, it is a preferred feeding zone and it also provides physical refuge for young fish to escape from larger predatory fish.

Young fish (bull trout, chinook salmon, and other resident and anadromous native species) are assumed to be present in Lake Washington and using the shoreline in existing conditions. The lagoon would create additional shallow shoreline for use by these species. The proposed lagoon design includes several features to guard against elevated water temperatures in the lagoon during the summer, as discussed in the response to issue WDLF 6 and in **Section 3.4.2** of the Final EIS.

Bald Eagles

Construction impacts on bald eagles would be expected to be minimal. The nearest bald eagle nest or wintering territory is at least 1.5 miles from the park (Brookshire, pers. comm.). That nest site has not been used by bald eagles for several years. Construction projects are generally not considered to have impacts on bald eagles unless they are within 0.5 miles of a nest. Bald eagles could use the shallow waters off-shore to catch fish or to access fish carcasses washed ashore. The excavation of the lagoon might provide a temporary loss of shallow shoreline habitat during construction, and heavy equipment use could influence use during daylight hours. However, given the high current use of the shoreline for passive and active recreation by humans (including a very active power boat launch immediately adjacent), it is not anticipated that construction impacts of the phased project would represent anything but temporary, minor impacts to bald eagle use of the site.

Issue WDLF 8: Construction impacts on frogs

Issue: One comment requested to see scientific data supporting the DEIS statement that amphibians would increase, and wanted to know about impacts on frogs from 10 years of construction.

Applicable Comments: I122-4

Response:

Creating acres of shallowly inundated ponds with stable water levels, as well as permanent seasonally inundated ponds across the habitat area of the project, is the basis for concluding that amphibian habitat would be increased over existing conditions. The only habitat on site in existing conditions identified with amphibian breeding use is Frog Pond, which the project has been carefully designed to avoid during construction and in future conditions. Research by Klaus Richter (King County staff) and Bill Leonard (Washington Department of Transportation), two nationally recognized experts on amphibians, was used in the design of habitat components for future conditions. The marshy flow-through ponds on the western margin of the habitat area are designed to fill with water early in fall and remain with stable water levels through late spring, a critical parameter for breeding amphibians. Secondly, upland mixed forest community is proposed adjacent to many wetland habitats on site and linking across the site to the upland forests of Promontory Point. Amphibians use wetland habitats for only a portion of their life-history needs, while research by Richter and Leonard has documented that mature upland forest habitats are important for amphibian populations to be sustainable over time. Therefore, the project design anticipates the two key habitat components necessary for amphibian population viability: stable emergent wetlands with thin-stemmed emergent vegetation present, and upland forest.

Although construction would be sequenced over 10 years, it should be anticipated that populations of amphibians would remain and/or recolonize the site after construction is completed, just as populations successfully colonized the site after 50 years of military use. As an example of this process, a beaver population became established in Meadowbrook Pond within 2 years of construction of a pond on nearby Thornton Creek, where no pond had previously ever existed. Wildlife populations are often astounding in their ability to find and utilize habitats in spite of human effects.

4.2.6 Energy and Natural Resources (ENR)

Issue ENR 1: Electric energy and water consumption

Issue: A number of comments raised issues about significant increases in electric energy and water consumption associated with the project and stated this was not adequately addressed in the EIS. Specific aspects of individual comments in this issue category included statements about the demand for new power at peak times, purported understatement of the power usage increase, the project power need relative to energy conservation goals, and the fairness of the Seattle City Light rate structure. Several commenters noted that the project would increase energy consumption at a time when the public is being asked to conserve electricity, and several stated that the project would be a waste of energy.

Applicable Comments: A4-15, O14-9, O15-30, I37-11, I44-4, I51-3, I51-10, I149-4, I176-1, I188-4, I209-18, I273-2, T14-2, T44-2

Response:

Section 3.5 has been revised in the Final EIS to include a new section specifically addressing water consumption for the project. The discussion of energy impacts has also been supplemented, primarily to provide more specific information about expected power demands relative to peak load times on the Seattle City Light system. As in the Draft EIS, the Final EIS identifies the demand and annual energy consumption estimated for the project and compares these figures to corresponding measures for the system, as the Department considers these to be the most relevant and appropriate measures of project energy needs. An essentially infinite range of other comparative measures could be presented but are not necessary.

Comments relating to increased energy consumption at a time when conservation is needed, to wasting energy or to the fairness of the Seattle City Light rate structure are subjective statements that reflect the values and beliefs of the speaker or writer. Some reviewers clearly believe the proposed use of electricity to light sports fields is inappropriate and socially irresponsible, while others clearly believe it is a worthwhile expenditure of energy resources. There is no objective resolution to this issue, and no further response to such comments is possible.

4.2.7 Noise (NOI)

Issue NOI 1: Operational noise from use of the proposed sports fields

Issue: Many comments raised the issue of a significant increase in noise levels due to operation of the sports fields included in the proposed action. Some comments also asserted that noise readings were not taken in surrounding residential neighborhoods but should have been, because the hillside acts as a natural amphitheater to direct sound from events at the park. In addition, comments stated that because background noise is less at night, noise from events at Sand Point Magnuson Park fields in the evenings would be more noticeable in the surrounding neighborhoods. Some comments asserted that a long history of complaints from local residents about noise from Sand Point Magnuson Park was well documented and should have been disclosed in the EIS. Other comments stated that noise impacts to on-site residents were not analyzed adequately, and that both existing and proposed noise levels are unacceptable.

Applicable Comments: O2-10, O2-11, O8-4, O12-3, O13-5, O14-10, O16-7, O17-4, I44-6, I61-5, I68-2, I68-8, I69-2, I79-3, I79-4, I80-1, I121-5, I121-7, I148-1, I149-7, I155-4, I176-1, I193-3, I209-3, I209-14, I215-1, I215-4, I221-4, I232-4, I248-1, I253-2, I24-5, I259-2, I260-2, I266-3, I266-8, I268-6, I269-1, I285-10, I292-10, I296-2, I299-4, I301-2, I307-4, I311-2, I316-1, I333-11, I333-16, I334-1, I337-2, I343-2, I354-1, I367-5, I373-1, T2-2, T2-6, T13-4, T18-4, T19-3, T21-1, T23-4, T24-3, T26-1, T38-1, T41-5, T42-1, T43-2, T44-3, T45-4, T47-4

Response:

In response to these review comments on the Draft EIS, the Department of Parks and Recreation commissioned additional noise analysis of the proposed project. This supplemental study included measurements of existing sound levels on the project site and in the nearby local area, specific predictions of worst-case noise from athletic activities and related traffic on both on-site and off-site locations,

consideration of potential mitigation measures, and a substantial revision to the noise section (**Section 3.6**) of the Final EIS.

All of the specific aspects of the operational noise issue identified by the comments in this category are addressed in some fashion in the revised **Section 3.6** of the Final EIS. The following response discussion also addresses each specific aspect of the issue, generally explain what was done in response and the corresponding results. The response discussion is organized under the following subject headings: (1) the existing sound environment; (2) past noise complaints; (3) noise impacts to residents of the on-site housing; (4) noise impacts to off-site residential areas; (5) traffic noise; and (6) other specific issues.

Existing Sound Environment

In response to comments on the Draft EIS, additional sound level measurements were taken on the Sand Point site (at SPCHA Building 224), in the View Ridge neighborhood, and in the residential area to the south of the project site. A trained noise observer and analyst visited each of the monitoring locations several times to install equipment, observe existing conditions and record measured sound levels. Sound levels of various types of activities anticipated to occur at the sports fields were also measured. Results of the sound level measurements are documented in the revised **Section 3.6** and in **Appendix E** of the Final EIS.

In general, several comments are correct in noting that there are often hours in the day when sound levels in the View Ridge neighborhood are fairly low. Sound level measurements taken at the corner of 56th Avenue NE and NE 73rd Street in May 2002 recorded large variations in sound levels in this area. The average day-night sound level (Ldn) over a 3-day period was 60 dBA. Average hourly sound levels (Leqs) during the daytime hours varied from 44 to 64 dBA, while average sound levels (Leqs) between 10 and 11 p.m. varied from 46 to 47 dBA. Maximum daytime sound levels (Lmaxs) ranged from 66 to 87 dBA; maximum sound levels (Lmaxs) between 10 and 11 p.m. ranged from 69 to 72 dBA.

Past Noise Complaints

Several comments maintained that there was a well-documented history of numerous citizen complaints about noise from the activities at Sand Point Magnuson Park, and stated directly or implied that sports field activities were the source of many complaints. In response to these comments, DPR staff investigated official City of Seattle sources where any such complaints would be recorded. These sources included DPR files, Seattle Police Department records, and Seattle Department of Design, Construction and Land Use records. The results of this records search are documented in **Section 3.6.1.4** of the Final EIS. In summary, the searches of DPR and DCLU files produced negative results, while the SPD dispatch records indicated there have typically been a handful (from 0 to 7) of unspecified noise complaints per year with a Sand Point Magnuson Park dispatch address.

In discussions with the noise analysts, DPR staff indicated their anecdotal knowledge is that noise complaints from the View Ridge neighborhood are received on occasion, typically in response to activities occurring in the buildings at the north end of the Sand Point site (Buildings 2 South and 27). These activities tend to include live, amplified music or voices. One event involved noise from a "fire pipe" that created a sonic-boom type noise that elicited several complaints. The Department has responded in the past by disallowing certain types of activities or equipment, or by closing doors of venues. However, the past events coordinator for Sand Point Magnuson Park did not recall noise

complaints associated with athletic activities at either the Sand Point or Magnuson Park fields. The proposed project would increase use of sports fields on the site, but would not affect the activities scheduled in the buildings on the northern portion of the Sand Point site. The proposed project does not include any additional venues for musical concerts, and would not increase or decrease the frequency of music activities occasionally held in the buildings in the northern section of the Sand Point site.

Noise Impacts to On-Site Residents

To summarize the results of the noise study with respect to the residents of the SPCHA homeless transitional housing west of Sportsfield Drive, predicted sound levels at Building 224 during the fall and winter months would easily meet the Seattle noise limits for longer-term noise of 55 dBA during daytime hours and 45 dBA after 10 p.m. In addition, noise from athletic activities would generally fall within the range of existing sound levels experienced at Building 224. The predicted spring and summer sound levels from all fields in use would also easily meet Seattle's daytime noise limits at Building 224. In fact, sound levels in the future would likely be lower than the existing sound levels during maximum daytime usage of the fields. The proposed project would spread park activities over a larger area and thereby increase the distance between many of the activities and Building 224, thereby reducing the sound levels of many of the activities.

The predicted sound levels from spring and summer use of the athletic fields after 10 p.m. could exceed both Seattle's L25 noise limit of 45 dBA and maximum short-term event limit of 60 dBA. This would primarily be due to baseball or softball games played at Fields 7 and 11. Potential mitigation for this impact includes restricting use of these fields to no later than 10 p.m.

The EPA recommendation is for a day-night sound level (Ldn) of 55 dBA. (The Ldn is a 24-hour average sound level, with a 10-decibel penalty added to sound levels that occur between 10 p.m. and 7 a.m. in consideration of potential disturbance of people trying to sleep.) The EPA level is a guideline and not a regulatory limit, because the cost and feasibility of achieving these levels was not considered in setting the guideline. Also, most locations in urban neighborhoods do not currently meet the EPA guidelines, and most residents would probably not consider themselves severely impacted by noise. For instance, the measured Ldn during the 4-day measurement at Building 224 was 56 dBA, exceeding the EPA's recommended limit. On the hillside in the View Ridge neighborhood, from which numerous residents have commented on the existing quiet character of their neighborhood, the three day measured Ldn was 60 dBA (Saturday afternoon to Tuesday afternoon). This indicates that compliance with the EPA's recommended level of 55 dBA, while a noble goal, is not necessarily an accurate indicator of noise impacts. Finally, assuming that the proposed project would emit sound levels as high as permitted by the Seattle noise limits for every hour the fields would operate (55 dBA from 9 a.m. to 10 p.m. during the weekends), the estimated Ldn of park activities would be no higher than 52 dBA. Because this example is a considerable exaggeration of anticipated park usage, the actual Ldn from park activities would be lower. During the week, the park would see far fewer hours of activity and the Ldn would be lower still.

Potential noise impacts at the proposed new transitional housing units were not included in the noise analysis because the housing plan is, as yet, unrefined. No detailed design information is currently available for the units, and no real timeline exists indicating when these units might be constructed. The following potential noise levels were identified based on predicted noise levels at Building 224 and the limited information available regarding the proposed units.

Noise from soccer on Field 14 would be audible at some of the 28 units considered for a site south of NE 65th Street. Under the proposed action, the maximum noise events received at the nearest unit could exceed the short-term limit of 60 dBA after 10 p.m. However, a potential mitigation measure of switching the locations of Fields 14 and 15 to move activity occurring after 10 p.m. further from the proposed new units would result in maximum noise events that meet the nighttime limit.

Noise received at a location west of Sportsfield Drive considered as a site for 70 new units would be similar to but slightly higher than the levels received at Building 224. In summary, noise from baseball games played after 10 p.m. on Fields 7 and 11 could exceed the maximum limits at the new proposed units adjacent to Sportsfield Drive. In addition, noise from traffic on Sportsfield Drive could contribute to the overall noise levels of the proposed action, which could exceed the Seattle noise level (L25) limit. One possible mitigation measure specified in the revised noise section of the Final EIS would be to prohibit the use of Fields 7 and 11 after 10 p.m.

Because the design process for the new housing units has not yet begun, it is not possible at this time to know the configuration of the housing on the site(s) or the directional orientation. It is conceivable that the housing could be located on the Sand Point site and built in a configuration that would minimize noise impacts from the sports fields.

Noise Impacts in Off-Site Residential Areas

The supplemental noise analysis also applied worst-case assumptions to estimate the sound levels that would result from maximum usage of the proposed sports field complex in residential areas west and south of the project site. Daytime and nighttime sound levels were calculated for two locations in the View Ridge residential community and another in the residential area south of the project site. The sound levels predicted for all three of these neighboring residential locations indicate park operational noise would not only easily meet the Seattle noise limits, including the stricter nighttime limit that applies between 10 and 11 pm, but would also generally be far below measured existing sound levels. The results of the analysis are documented in **Section 3.6.2.2** of the Final EIS.

During one monitoring visit to the off-site locations, heavy daytime activity at the existing Sand Point Magnuson Park sports fields included 6 concurrent ultimate Frisbee games and one Little League baseball game. Noise from these activities was barely audible in the View Ridge neighborhood on 56th, 57th, and 58th Avenues NE, and then only during abnormally loud cheering events. Because the noise levels in the project vicinity tend to decrease during later evening hours, the sound levels from the future sports fields would likely be audible more frequently during the later evening hours, particularly any such maximum events (cheering).

In comparison to the measured existing sound levels, the predicted sound level for the proposed action during peak usage at residences on the View Ridge hillside was 38 dBA, with a maximum estimated sound level of 54 dBA for a peak event (i.e., a loud cheer). Although the maximum events from park activities would occasionally be audible when other background noise sources are low, worst-case estimates of such park noise events indicate they would be far lower than existing maximum events, and would easily meet Seattle's noise limits. Thus park activity noise is not expected to constitute a significant noise impact in these off-site residential areas.

Similarly, predicted noise levels of park activities received at the Park Point condominiums on the west side of Sand Point Way NE (the closest off-site location analyzed) would easily meet Seattle's daytime and nighttime noise limits during peak spring and summer use. Predicted sound levels are very conservative because the calculations did not consider the numerous intervening buildings between the Park Point Condominiums and most of the athletic fields. Therefore, noise from the proposed project affecting residences at the base of the hillside west of Sand Point Way NE are not anticipated to cause noise impacts.

The sound level predictions included in **Section 3.6** of the Final EIS considered only distance attenuation, and did not consider temperature inversions or any other meteorological variables that would either enhance or reduce noise. But even though a temperature inversion could cause levels at distant locations to increase by a few decibels (generally 3 to 4 dBA with a strong inversion), the predicted levels would still easily meet the Seattle noise limits at the hillside locations, including the stricter nighttime limit applicable after 10 pm. At the same time, the noise predictions also did not include factors like atmospheric absorption or the presence of intervening structures that would tend to reduce noise transmission to distant locations. For example, atmospheric absorption in the frequency range of human voices would reduce the estimated sound levels at the distance to the hillside by approximately 3 decibels, enough to compensate for the noise increase potentially caused by a temperature inversion. Finally, it is worth noting that temperature inversions are generally strongest in the very early morning hours, long after park activities would have concluded, and they tend to occur more often in winter when the level of anticipated use at the park would likely be lower. Therefore, the influence of temperature inversions on noise from the sports fields would not change the conclusions of the noise analysis.

Traffic Noise

The supplemental noise studies conducted for the Final EIS included consideration of the noise from traffic associated with the sports fields. Please refer to the revised **Section 3.6.2.2** in the Final EIS. In summary, additional traffic volumes on local roads between 10:30 and 11:30 p.m., after cessation of activities at the sports field complex, would increase overall noise levels in the project vicinity by 2 dBA or less and are not anticipated to result in noise impacts.

Other Specific Issues

Environmental noise studies of proposed projects do not typically include an assessment of community response (i.e., a survey of residents) to a proposed noise source because the studies tend to be conducted prior to the existence of the noise source. To assess the potential for noise impacts from a project, a noise analysis will typically include one or more baseline measurements and predictions of future levels that can be compared with applicable noise limits and existing sound levels. The supplemental noise analysis conducted for the Final EIS included these components, as presented in the revised **Section 3.6**.

The assessment of potential cumulative noise impacts presented in the EIS is sufficiently inclusive in its consideration of other noise sources. The residential use associated with the expanded student housing is consistent with the existing uses in the project vicinity and would not be anticipated to substantially alter the existing noise environment. Because much of the student housing is currently in use, any noise from these units would also have been included in the sound level measurement taken on the hillside south of the project site. Similarly, the traffic counts taken in the project vicinity in June 2002 would have included this use. In this way, the student housing was inherently included in the noise analysis. The

new Children's Hospital development is anticipated to be a medical support office building, with few noise sources and little potential for substantially affecting the existing noise environment. Traffic associated with the hospital offices would be greatest during the peak traffic hours in the morning and late afternoon, not during the late evening hours when noise from traffic exiting the sports fields would have the most potential for impacting the surrounding neighborhoods.

Issue NOI 2: Provisions of and compliance with the City noise ordinance

Issue: Several comments raised issues relating to control of noise through the City's noise ordinance. Two comments questioned why the noise ordinance did not limit noise generation from the sports fields to daytime hours only. Another stated that the DEIS did not address the City's noise ordinance, but that allowing field use until 11 PM would violate the ordinance. One commenter asserted that the project as proposed would definitely violate the City's noise ordinance, and demanded a quantitative demonstration of compliance with the noise ordinance.

Applicable Comments: O2-12, I51-4, I51-8, I209-2, I292-11

Response:

The Seattle noise ordinance does not limit construction activities to daylight hours. It does, however, only allow for construction noise to exceed its operational noise limits only during daytime hours, which are defined as 7 a.m. to 10 p.m. on weekdays and 9 a.m. to 10 p.m. on weekends and holidays. This effectively limits all but the quietest construction activities to daytime hours unless a noise variance is acquired. No construction noise variance is being requested with the proposed project.

Instead of limiting activities to daytime hours, the City of Seattle tries to protect its citizens from undue amounts of noise by reducing the limits for noise received in residential areas by 10 dBA after 10 pm. Because both the park and the surrounding communities are zoned residential, the park activities are subject to the strictest noise limit of 55 dBA during daytime hours and 45 dBA during nighttime hours, with allowed short-term exceedances. The supplemental noise analysis conducted in response to comments on the Draft EIS indicates that noise from activities at the expanded facility would comply with these noise limits at all off-site residential locations.

The nighttime activities at the proposed sports fields would either have to meet these more stringent nighttime noise levels (i.e., an L25 of 45 dBA and an Lmax of 60 dBA) or attempt to get a variance from the City to allow for the louder activities. At the off-site residential areas (i.e., View Ridge, Windermere, Park Point), the worst-case sound levels predicted in a supplemental noise analysis would easily meet both Seattle's daytime and more stringent nighttime noise limits. At the SPCHA transitional housing in Building 224, the maximum noise limit of 60 dBA might be exceeded by adult baseball/softball games played on Fields 7 and 11 after 10 p.m. If these worst-case predictions proved to be correct and sound levels did exceed Seattle's noise limits, DPR would either have to restrict the use of these fields to hours before 10 p.m. or develop other effective means of reducing park noise to an acceptable level. Ultimately, park noise would not be permitted to exceed the Seattle noise limits.

Issue NOI 3: Treatment of impacts from construction noise

Issue: Two comments raised issues with treatment of construction noise impacts in the Draft EIS. One comment stated no mitigation for the construction noise and traffic was planned, that movement of earth into and out of the park would affect neighboring residents, and that construction noise was not adequately addressed in the Draft EIS. Another comment asserted that 10 years of construction-related noise would be an unfair burden to the community.

Applicable Comments: O2-13, I301-3, T4-2, T24-1

Response:

Contrary to comment I301-3, the Draft EIS discussed mitigation for construction noise in **Section 3.6.5**. The Draft EIS also discussed mitigation for construction traffic in **Section 3.12.6.1**. **Sections 3.6.5** and **2.2.11** both stated that barge transportation would be preferred if large quantities of fill material needed to be imported to the site; using barges instead of trucks would minimize or eliminate one significant potential source of construction noise. **Section 3.6** has been supplemented for the Final EIS, including some additional and revised material on construction noise impacts.

The question of whether construction noise over a 10-year period would be an unfair burden to the community is a subjective assessment based on individual beliefs and values. It should be noted, however, that while construction activity for the project is expected to span a total period of about 10 years, construction activity and associated noise would not be continuous or pervasive throughout that period. Large-scale construction activities would tend to be concentrated during relatively short periods of time, primarily the drier season that is preferred for earthmoving and grading. Construction activities would occur over a large area during four different phases of the project, so the locations of concentrated activity would shift during the construction period. During the 10-year period, much of the construction activity would be quite distant from any one residential area for a large portion of the construction season, resulting in much lower levels of construction noise for the majority of the time. Please refer to the revised discussion of construction noise in **Section 3.6.2** of the Final EIS.

Issue NOI 4: Adequacy of mitigation for noise impacts

Issue: Several comments criticized the mitigation measures for operational noise identified in the EIS. These comments stated either that the EIS did not address mitigation for operational noise impacts or that the measures identified were inadequate.

Applicable Comments: O12-4, O13-6, I221-5, I268-7

Response:

Section 3.6, including the discussion of mitigation for operational noise impacts in **Section 3.6.5**, has been revised and supplemented for the Final EIS. The mitigation measures that are discussed in the Final EIS are measures that appear to be feasible and that are consistent with the location and level of the impacts identified through the revised analysis.

4.2.8 Land Use (LU)

Issue LU 1: Consistency with park designation as an environmentally critical area

Issue: One comment pointed out that Magnuson Park is designated by the City of Seattle as an Environmentally Critical Area for wildlife, and said the Draft EIS did not address how the proposed action could affect this designation. This comment was also coded as a wildlife issue (WDLF 4), but is addressed primarily within the context of consistency with land use plans and policies.

Applicable Comments: O15-4

Response:

Section 3.7.2 of the Final EIS has been modified to include a discussion of the environmentally critical areas component of the City's land use plans and policies. The new material indicates the area within Sand Point Magnuson Park that has been designated as a critical area for fish and wildlife habitat and explains the regulatory provisions associated with this designation. In summary, DCLU staff would need to review permit applications for the proposed project for consistency with the critical area regulations. Based on the provisions of the program (as described in **Section 3.7.2**) and the characteristics of the proposed project, which would provide a net increase in fish and wildlife habitat function, DPR assumes the project would be consistent with the critical area designation.

4.2.9 Aesthetics (AES)

Issue AES 1: Impacts on views of the lake and Magnuson Park

Issue: Several comments raised issues relating to views from residential areas and the effects of the proposed action on those views. Most of those comments incorporated reference to the relationship between views and property values, and/or to the effects of lighted sports fields on nighttime views. One comment, for example, stated that building sports fields and erecting lamp-posts would ruin the landscape. Another asserted the lighted sports fields would decrease home values and intangible attributes for all (residents) with views of Lake Washington and Magnuson Park.

Applicable Comments: I5-1, I37-10, I37-12, I44-7, I61-1, I67-2, I281-3, I284-4, I357-3, I358-2, T12-3, T28-4, T43-1, T46-2

Response:

Section 3.8.2 of the EIS provides a detailed assessment of the locations from which views of the facilities included in the proposed action would be possible, and the characteristics of those views. Several new graphics have been added to that section for the Final EIS, depicting simulated daylight views of the project site with the addition of the proposed action. **Section 3.8** focuses on the structural characteristics of the project and the extent to which they would modify the existing landscape, and therefore is applicable primarily to daylight views. The visibility of the proposed sports field lights is addressed in detail in **Section 3.9**, which has also been revised for the EIS in response to Draft EIS review comments.

The EIS does not specifically address any potential connection between views and property values, as explained in the response to issue SEPA 6. The responses to issues L&G 1 and L&G 2 are also relevant to the comments in this category that address views in conjunction with lighting impacts.

4.2.10 Light & Glare (L&G)

Issue L&G 1: Methodology used to assess light and glare impacts

Issue: Several comment letters asserted that the methodology used to measure and calculate light, glare, sky glow, etc., is not adequate. Other comments stated that the Draft EIS failed to consider the visual perception of light, especially at night, in determining impacts.

Applicable Comments: O2-6, O2-7, O2-8, I51-2, I51-7, I121-1, I209-4, I209-15, I285-6, I317-2, T13-5, T16-4, T17-5, T25-2, T25-4, T55-1

Response:

The Final EIS (**Section 3.9**) has been revised with additional information to further address lighting impacts and the methods for assessing those impacts. The revised material includes additional information addressing in greater detail the differing light considerations, plus additional explanation of relative foot-candle values, glare types, spill light, luminance and sky glow. The area of calculated spill light has been expanded to reflect a larger area for what is considered an illuminated surface. A greater emphasis has also been placed on the amount of reflected light (luminance) associated with the synthetic turf surfaces. These impacts have been assessed and quantified in the Final EIS to the greatest degree possible, using industry standards for computer calculations and measurement techniques. The Draft EIS was correct in stating that there are no generally accepted methods for measuring glare and skyglow, and for quantifying those aspects of lighting impacts.

Issue L&G 2: Characterization or acceptability of light and glare impacts

Issue: Many comments took exception to the characterization of the light and glare impacts identified in the Draft EIS, and/or stated that the light and glare impacts to on-site and adjacent residents would not be tolerable. Some of these comments referred to the October and November lighting demonstrations, stating the light in those cases was bad enough and consisted of only three light poles where the proposed action contains 85 poles. Other comments requested that the lights for the athletic fields only be allowed until 9pm, not 11pm. Still other comments stated that not enough information is contained in the Draft EIS to determine what the impacts will truly be.

Applicable Comments: O2-5, O4-1, O5-1, O8-3, O10-4, O12-1, O12-2, O12-6, O13-4, O14-7, O16-4, O16-6, O17-2, I1-1, I5-2, I5-5, I41-3, I44-3, I61-2, I61-2, I67-3, I68-4, I68-7, I69-1, I72-2, I79-2, I79-5, I80-2, I107-1, I119-1, I121-2, I121-6, I146-2, I146-6, I148-2, I149-2, I155-3, I159-1, I166-1, I173-2, I177-1, I188-2, I193-2, I205-4, I209-6, I209-14, I215-1, I215-4, I220-3, I221-1, I221-3, I221-9, I232-3, I248-1, I253-1, I254-1, I254-3, I258-1, I259-2, I260-2, I262-1, I266-2, I266-6, I266-8, I268-3, I269-1, I273-1, I281-1, I282-1, I284-2, I285-5, I285-7, I288-3, I288-5, I292-1, I292-5, I292-9, I296-4, I297-1, I297-2, I299-1, I301-1, I307-1, I307-3, I309-3, I317-1, I333-1, I333-9, I333-15, I334-1, I342-2, I342-4, I343-3, I354-3, I356-1, I357-1, I358-1, I366-1, I367-1,

I367-2, I367-3, I373-1, T1-2, T1-4, T2-3, T4-1, T5-2, T11-6, T12-2, T13-2, T13-4, T13-7, T18-1, T19-1, T25-3, T25-5, T26-2, T28-1, T28-3, T30-1, T33-1, T34-1, T35-1, T38-2, T41-6, T42-2, T43-1, T45-2, T45-9, T46-2, T47-1, T47-3, T48-1, T48-2, T55-1

Response:

Section 3.9 has been substantially revised for the Final EIS in response to these comments. The revised material includes additional information addressing in greater detail the differing lighting considerations, plus additional explanation of relative foot-candle values, glare types, spill light, luminance and sky glow. The area of calculated spill light has been expanded to reflect a larger area for what is considered an illuminated surface. A greater emphasis has also been placed on the amount of reflected light (luminance) associated with the synthetic turf surfaces. The expected levels of impact for all specific types of lighting impacts (spill light, glare and skyglow) have been carefully reviewed and assessed relative to applicable standards (which are limited) and the context and intensity of the impacts.

The proposed lighting design for the athletic field lighting systems meets all of the current City of Seattle lighting requirements. The lighting systems are also designed with the intent of meeting the current standard practices with athletic field lighting system design implemented by the Department of Construction and Land Use to limit the environmental impacts on adjacent properties. The lighting system design also complies with the new spill lighting guidelines outlined in the Seattle Department of Parks and Recreation "Ballfield Lighting Study (WC 50)". This includes the environmental affects for spill light on the adjacent housing across Sportsfield Drive. For the purposes of lighting design, the sports field area has been addressed as though it were its own property (as opposed to part of a larger park). The associated lighting impacts would meet City spill light requirements at that property line, in this case, the eastern edge of Sportsfield Drive.

The two lighting demonstrations arranged by DPR were intended to educate and inform the public as to the what lights were being considered for the project and to solicit comments from the general public on preferred lighting systems. The public input generated as a result of the lighting demonstrations was incorporated into the lighting design, most notably through maximizing the use of full cut-off fixtures, (the largely preferred fixture) wherever possible. The lighting demonstration was also intended to simulate the impacts that the three different lighting systems could generate, if deployed on a larger scale. It was limited to three poles because a full-scale mockup would not have been practical in either physical or economic terms.

An 11 PM time limit for night sports field use was employed in the analysis to reflect current park policy, and allowed the EIS to assess the maximum impact of lighting. Restricting the hours of field lighting operation was identified in the Draft EIS as a potential mitigation measure. The final determination of the field operating schedule is a decision to be made by the City Council, based on impacts outlined in the Final EIS and other information.

Issue L&G 3: Consideration of cumulative light and glare impacts

Issue: A number of comments stated that the cumulative effects of lighting from all areas and activities that occur at Sand Point Magnuson Park should be considered when determining the impacts of light and glare on the residential and wildlife communities.

Applicable Comments: O15-28, I205-3, I209-7, I266-7, I268-8, I285-8, T11-4, T15-2, T16-2, T17-2, T39-1

Response:

As was done for all elements of the environment, **Section 3.9** of the EIS considers all appropriate actions in assessing the potential for cumulative light and glare impacts.

4.2.11 Recreation (REC)

Issue REC 1: Consideration of passive recreation uses and users

Issue: Two comments asserted that the EIS overlooks opportunities as well as impacts to passive recreation park users, i.e., those who walk, picnic, meditate, etc., in favor of those who participate in organized sports, or that the Draft EIS did not adequately consider those users. One of the comments indicated that park walkways are congested in the summer, and that passive park use numbers should be counted as a separate category.

Applicable Comments: O14-4, I334-2

Response:

Section 3.10 of the Draft EIS provided documentation of existing passive uses of the park and the project site and assessed the expected effects of the project on those uses. This section has been modified for the Final EIS to provide additional discussion of existing and proposed opportunities for passive recreation. While the proposed action includes a large complex of sports fields for active recreational pursuits, it also includes a 65-acre wetland/habitat complex that would provide excellent opportunities for passive recreation. The project also includes a variety of amenities that would facilitate and promote passive uses. The material on existing conditions (**Section 3.10.1.1**) does not report data on the numbers of passive users because those data are not available.

Issue REC 2: Scheduling and allocation of time on sports fields

Issue: A number of comments stated that residents in the surrounding neighborhoods do not want to have the park and athletic fields overscheduled so that it is impossible to use the park/fields in a spontaneous manner occasionally. Other comments asserted that once the monetary investment is made in the park, this will be justification to have the fields in constant use. This would be an impact to neighbors in that the fields would in essence be privatized for sports field users when they are supposed to be for all the public to use.

Applicable Comments: O17-6, I5-4, I41-4, I166-2, I292-4, T5-3

Response:

This issue is addressed in detail in **Section 3.10.2** of the Final EIS. In summary, scheduling of field use would be done according to City-wide policies in the future, as is presently the case for the existing fields.

Opportunities for informal, unscheduled use of fields would increase overall with the proposed action, simply by virtue of the increase in sports fields.

4.2.12 Historic & Cultural Preservation (CUL)

Issue CUL 1: Level C review and consultation for Building 15

Issue: One comment stated that the Parks Department would need to conduct a Level C Review for the proposed demolition of the Hobby Shop (Building 15) located at the corner of NE 65th Street and Sand Point Way because the building is part of the Sand Point Historic District. The comment indicated the review should include consultation with the State Historic Preservation Officer, consideration of alternative to demolition, and identification of other mitigation measures.

Applicable Comments: A9-1

Response:

This comment is generally consistent with the discussion of impacts and mitigation presented in **Section 3.11.3** of the Draft EIS. The Department of Parks and Recreation will consult with the SHPO as requested. The discussion of potential impacts to historic resources has been modified for the Final EIS to acknowledge this input concerning the significance of Building 15.

4.2.13 Transportation (TRAN)

Issue TRAN 1: Analysis of impacts to traffic outside of the park

Issue: Numerous comments raised issues related to the traffic impacts of the project on the neighborhoods near the park. Some of these comments stated that the EIS does not adequately address impacts from increased traffic associated with the proposed action, while some maintained that traffic volumes are understated. Several comments noted the projected increase in daily traffic volumes, and felt these were not consistent with the Draft EIS conclusions regarding level of service impacts. Other comments noted that several specific intersections were not included in the traffic analysis conducted for the project and should be. Still other comments asserted that traffic safety was not adequately addressed in the document.

Applicable Comments: A5-1, O2-9, O8-4, O11-1, O15-34, O17-3, I44-5, I63-1, I68-3, I72-3, I122-2, I148-1, I155-2, I176-1, I209-8, I221-7, I248-1, I253-3, I254-4, I258-1, I259-2, I260-2, I269-1, I281-2, I288-2, I296-1, I299-3, I307-4, I333-10, I334-1, I334-3, I337-1, I338-2, I343-2, I354-2, I357-2, I367-5, I373-1, T2-2, T2-5, T12-1, T15-5, T18-4, T19-2, T23-3, T24-2, T24-3, T44-6, T45-3, T46-5

Response:

In response to comments from the Seattle Transportation Department (SeaTran), PM peak-hour traffic counts were taken at the intersections of 35th Avenue NE/NE 65th Street and Sandpoint Way/NE 95th Street. Existing, no action and with-project traffic analysis was conducted for each of these intersections. The EIS has been updated to include the results of this analysis in the appropriate sections.

Traffic impacts were analyzed for the Draft EIS according to direction from DCLU. Study intersections were identified, as well as identification of pipeline projects such as Radford Court and the new Children's Hospital, background traffic growth, period of study and methodology for analysis were all done according to direction from DCLU, and applying standard engineering practices. Great effort was taken to carefully project not only the project's impacts, but also to specifically address other impacts of new occupancy and development of other portions of the park.

The project is expected generate 2260 net new *daily* trips. These trips would be distributed over the entire day and in a variety of directions on the local street network. An increase of X percent in the daily trips to/from a traffic source does not mean that traffic volumes at nearby intersections would increase by the same rate. The weekday PM peak hour is typically the hour of the day with the highest traffic volumes. This time period is studied because, by analyzing in the hour with highest over-all volumes, it is assumed that typically all other hours would operate at a better level. The Draft EIS examined the weekday PM peak for the level of service analysis. **Table 3.12-6** illustrates the traffic volume impacts for the weekday PM peak hour. Increases at the study area intersections, aside from the intersections immediately adjacent to the park, are expected to increase by 3 percent or less during the weekday PM peak hour. **Section 3.12.4.5** of the Final EIS has been updated to make this discussion more clear. The difference in existing and future "no action" traffic volumes can be derived by comparing the volumes shown in **Figure 3.12-2** with those in **Figure 3.12-3**. The percentage increase varies by intersection.

The project related traffic volumes are based on trip rate information from similar park projects in King County. The trip rates used to estimate the project traffic represent a conservative analysis. Trip rates for this project are slightly higher than trip rates in several other published studies for similar projects, and are also slightly higher than rates based on information provided by the Department of Parks and Recreation on existing and future schedules and attendance. It was conservatively assumed that all fields would be scheduled for games during the peak hour studied, but actual game schedules might vary. Additionally, arrivals would be staggered, as individuals and teams have different warm-up schedules and arrival times.

A queuing analysis was conducted for the existing, 2007 No Build and 2007 Proposed Action conditions for all the study area intersections. The results of this analysis have been added to the text of the Final EIS.

Because there would be an increase in traffic attributed to the project, there may be a commensurate increase in the potential for traffic accidents to occur. The specific numerical increase cannot be reliably quantified because some of the variables affecting accident occurrence cannot be predicted or measured; however, the overall accident rates are unlikely to change significantly, because the percentage of project traffic at study area intersections is minor. Existing safety concerns, such as those stated for traffic crossing the Burke Gilman trail or travel speeds on NE 65th Street exceeding a safe design speed for the road are not caused by the project and do not have a direct bearing on the impact analysis. The City does provide a program to assist neighborhoods with traffic calming projects. Information on this program can be found on the Internet at the following site: http://www.cityofseattle.net/td/ntcpreso.asp. Additionally, the new signal at Sand Point Way NE/NE 70th will accommodate pedestrians and bicyclists crossing Sand Point Way.

Issue TRAN 2: Analysis of impacts to traffic and circulation inside the park

Issue: A second batch of transportation-related comments addressed issues associated with transportation and circulation within Sand Point Magnuson Park. Several comments stated directly or indirectly that the EIS does not adequately address impacts to pedestrians and cyclists from increased traffic in the park associated with the proposed action. These comments reflected a general concern over pedestrian safety in relation to park vehicle traffic. One comment stated the Draft EIS did not address the effect of increased traffic on the transitional housing.

Applicable Comments: A5-2, O12-5, O13-7, I253-4

Response:

Pedestrian improvements include the addition of a sidewalk on the north side of NE 65th Street from Sandpoint Way to the boat launch and on the east side of Sportsfield Drive from NE 65th Street to the northern boundaries of the project. It also includes several new internal trails providing connection through the project and to other parts of Sand Point Magnuson Park. These new sidewalks and trails would greatly improve accommodation of pedestrians through and in the park, providing clear separation from auto traffic and connections to parking and activity centers throughout the park. Park roadways are already posted with low speed limits, which would also be posted on signage included with the roadway modifications for the proposed action.

Section 3.6.2 of the Final EIS addresses the potential noise impact of project-related traffic on residents of the SPCHA transitional housing. These residents would not be using Sportsfield Drive to access the housing area and sports field users would not be traveling on 62nd Avenue NE to access the sports fields, so there should not be significant conflicts between these traffic flows.

Issue TRAN 3: Effects on seasonal parking demands

Issue: One comment referred to a problem with parking in a residential area that appeared to be associated with sports field use. This comment was interpreted to address seasonal parking demands associated with the proposed action.

Applicable Comments: I282-3

Response:

As stated in the Draft EIS, under the proposed action the park would have adequate parking to serve all on-site demand. A parking analysis performed separately for the Parks Department considered seasonal variations in visitation as well as special events held at the park, such as the Pumpkin Push and Best of the Northwest. The proposed supply, on a park-wide basis, would be adequate to meet the peak parking demands for all events. Some special management approaches would be needed to address those large events. Park staff are developing a management program to address those needs.

Issue TRAN 4: Promotion of private vehicle use

Issue: Two comments asserted that the proposed action encourages the use of cars because no transit access or other transit improvements are proposed. One comment stated the Parks Department needs to include incentives for carpools and transit use in the proposed action, and that transit access needed to be greatly improved to support the proposed action. Another comment claimed the Draft EIS does not address public transportation issues, and suggested the Department should have selected a site better served by public transportation.

Applicable Comments: O15-35, I209-8

Response:

Public transportation services are addressed in **Section 3.12** for the proposed action, the lesser-capacity alternative, no action and existing conditions. The proposed action acknowledges the prevailing individual travel patterns and the fact that transit service to the project site is available. Metro has no plans at this time to increase bus service along Sand Point Way. It is anticipated that any increase in transit demand could be accommodated without changes to the transit system. It should be noted that much of the future sports field use would be occurring during hours of the evening and weekends when transit service is typically scaled back in response to demand patterns.

The Sand Point Magnuson Park staff have developed a Transportation Management Plan (TMP) and are working on a parking management plan, both of which would encourage car sharing, bicycling and other alternative transportation modes. Though not specifically part of the project addressed in the EIS, the TMP addresses the tenants and activities located throughout the park.

4.2.14 Public Services & Utilities (PSU)

Issue PSU 1: Effects on public safety

Issue: Several comments expressed concerns related to public safety and emergency services. Most of these comments were general statements of concern about crime and expectations of a decrease in public safety with lighted sports fields supporting late-night use. One comment indicated security was not mentioned.

Applicable Comments: O10-1, O10-5, I155-5, I176-1, I299-5, I373-1, T24-4

Response:

This issue is addressed in detail in **Section 3.13** of the Final EIS. For a variety of reasons discussed in the text, the Final EIS retains the conclusion that the proposed project would not be likely to have significant impacts on public safety or emergency services.

4.3 NON-SUBSTANTIVE COMMENTS

A large majority of the more than 450 comment records documented by the Department of Parks and Recreation conveyed the writers' or speakers' opinions about the merits of the proposal but did not address a substantive EIS issue relating to alternatives, impacts or mitigation. Many individuals expressed support for the proposed action or for specific elements of the proposal, such as lighted sports fields. Many others voiced opposition to the project, typically based on objections to the expected influence of the project on the adjacent neighborhoods.

These non-substantive comments were grouped into five issue categories that involve multiple statements of support for or opposition to some aspect of the project, or support for the comments provided by other writers or speakers. These comments are statements of opinion, values or beliefs related to the proposal, but not to a specific aspect of the Draft EIS. Because these comments do not address the substance of the EIS, it is not possible or appropriate to provide a substantive response in the Final EIS. The decision makers who will undertake final action on the proposed project may consider this input when evaluating the proposal, however.

4.3.1 Support/Opposition (S/O)

Issue S/O 1: Support for lighted sports fields

Issue: Many comments expressed the writers' support for development of the proposed sports fields at Sand Point Magnuson Park. Most of these comments specifically indicated support for lighted sports fields, and for operating the lights until 11 PM.

Applicable Comments: A1-2, A1-3, O3-1, O3-2, O9-1, O17-1, I95-1, I95-4; also Individual Comment Records I2, I3, I4, 16, I7, I8, I9, I10, I11, I13, I14, I16, I17, I18, I19, I20, I21, I22, I23, I24, I25, I26, I27, I29, I31, 132, I33, I34, I35, I38, 139, I40, I42, I43, I45, I46, I47, I49, I50, I52, I53, I54, I55, I59, I60, I62, I64, I65, I66, I70, I71, I73, I74, I75, I77, I78, I82, I83, I84, I86, I87, I88, I90, I91, I92, I93, I94, I96, I97, I98, I100, I101, I102, I108, I109, I110, I111, I112, I114, I115, I116, I117, I118, I120, I123, I124, 1125, I126, I127, I128, I129, I131, I132, I133, I134, I135, I136, I137, I138, I139, I140, I141, I142, I143, I144, I145, I147, I150, I151, I153, I154, I156, I157, I158, I160, I161, I162, I163, I164, I165, I168, I169, I170, I171, I174, I175, I178, I179, I180, I181, I182, I183, I184, I186, I187, I190, I191, I195, I198, I200, I201, I202, I203, I206, I207, I208, I210, I211, I212, I213, I216, I217, I218, I219, I222, I223, I224, I225, I226, I227, I228, I230, I233, I234, I235, I236, I237, I238, I239, I240, I241, I242, I243, I244, I245, I246, I247, I249, I250, I251, 1252, I255, I256, I257, I263, 1264, I265, I267, I270, I271, I272, I274, I275, I276, I277, I278, I279, I283, I286, I287, I289, I290, I291, I293, I294, I295, I298, I300, I303, I304, I305, I306, I310, I312, I314, I315, I318, I319, I320, I321, I322, I323, I324, I325, I326, I327, I331, 1335, I336, I339, I340, I341, I344, I345, I346, I348, I349, I350, I351, I352, I353, I355, I359, I360, I361, I362, I363, I364, I365, I368, I369, I370, I371, 1372

Issue S/O 2: Support for wetland creation/restoration

Issue: A number of comments expressed support for enhancing or creating wetlands and other habitats at the park. Some comments in this category referred to specific features such as the proposed education center.

Applicable Comments: O7-4, O11-4, O15-5, I89-2, I258-1, T8-1, T23-6, T51-3

Issue S/O 3: Support for the lesser-capacity alternative

Issue: Some comments expressed support for the lesser-capacity alternative, or indicated that it was preferable to the proposed action.

Applicable Comments: O11-2, I231-1, I373-2

Issue S/O 4: Opposition to the proposed action

Issue: Many comments expressed opposition to the project or to one or more components of the project. Most of these comments objected to the sports fields in general, or to lighted sports fields specifically.

Applicable Comments: O8-1, O16-8, O17-1, I37-1, I44-2, I61-6, I63-3, I67-1, I72-1, I119-2, I155-7, I166-3, I209-18, I215-2, I215-3, I248-1, I259-1, I260-1, I266-11, I269-1, I292-3, I301-5, I333-6, I333-14, I342-1, I343-1, I367-6, T1-1, T2-1, T11-1, T18-2, T23-9, T25-1, T26-3, T28-5, T31-4, T32-2, T35-3, T37-2, T38-3, T48-3, T49-1, T50-1, T52-1, T52-3, T54-1, T55-3, T55-4; also Individual Comment Records I15, I28, I30, I48, I57, I58, I99, I113, I192, I199, I214, I313, 1332

Issue S/O 5: Support for the no action alternative

Issue: Some comments expressed support for the no action alternative.

Applicable Comments: I122-5, I311-1, I343-4, T15-1